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Report to the Chairman, Subcommittee on National Parks and Recreation, Committee on Interior and Insular Affairs, House of Representatives

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PARKS AND RECREATION

Limited Progress Made in Documenting and Mitigating Threats to the Parks

ORIGINAL

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Resources, Community, and
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February 9, 1987

The Honorable Bruce F. Vento
Chairman, Subcommittee on
National Parks and Recreation
Committee on Interior and
Insular Affairs
House of Representatives

Dear Mr. Chairman:

This report responds to your April 11, 1985, letter asking us to review actions taken by the National Park Service to address threats to the natural and cultural resources of the National Park System. Subsequent to your request, we agreed with your office to also provide an opinion on the extent to which current legislation obligates the Park Service to intercede in actions taken by others, on lands outside park boundaries, that would affect park resources.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 15 days from the date of this letter. At that time, we will send copies to the Director, Office of Management and Budget; the Secretary of the Interior; the Director, National Park Service; and other interested parties.

This work was performed under the direction of Michael Gryszkowiec, Associate Director. Other major contributors are listed in appendix VIII.

Sincerely yours,

J. Dexter Peach

J. Dexter Peach
Assistant Comptroller General

Executive Summary

Purpose

In 1980 the National Park Service reported more than 4,000 threats to the natural and cultural resources of the national park system, from both within and outside park borders. The following year, in response to a congressional request, the Park Service developed a strategy to prevent and mitigate the problems identified in its report. The Chairman, Subcommittee on National Parks and Recreation, House Committee on Interior and Insular Affairs, asked GAO to determine, among other things, what progress the Park Service has made in identifying, monitoring, and mitigating threats and how its resource management needs are reflected in the parks' resource management plans and Park Service budgets.

Background

In its 1980 State of the Parks report, the Park Service listed about 4,300 threats to the aesthetic qualities, cultural resources, air and water quality, plants, and wildlife of the nation's parks. According to the report, more than half the threats came from sources outside park boundaries and only about 25 percent were adequately documented. The Park Service claimed that it did not have enough staff and funds to adequately identify, monitor, and correct these problems or to give additional attention to external threats.

Following its report, the Park Service developed a servicewide strategy to improve its resource management capabilities. The strategy, to which the Park Service says it is still committed, called for each park to have a resource management plan for both its natural and cultural resources by the end of 1981. These plans were to (1) include an inventory of park resources and a detailed program for monitoring and managing the resources, (2) specify necessary staff and funding, and (3) assign priorities to projects so that resources provided could be allocated toward the most serious problems. The plans also were to be updated annually and used in formulating annual Park Service budgets.

To support the development and use of these plans, the Park Service announced a series of 11 initiatives to improve resource management information and staff capabilities.

Results in Brief

The Park Service's strategy for better managing park resources has yet to be fully implemented. Some parks do not have an approved resource management plan even though they were required to be completed by the end of 1981, others have not updated their plans, and the plans that have been prepared are not being used in formulating the Park Service's

annual budgets. Further, many of the 11 initiatives intended to support the development and use of the plans were not followed through.

The Park Service has not kept track of its progress in documenting and mitigating the threats it identified in 1980. The 12 parks GAO visited have corrected some of the resource problems, but most problems remain and many of those are still not well-understood or documented. Although the parks have proposed projects to address these problems, most were not funded.

Principal Findings

Resource Management Plans and Initiatives

Although all units of the national park system were required to prepare resource management plans by the end of 1981 and update them annually, only half met the original deadlines. As of August 1986, 35 units were still without approved cultural plans and 31 without approved natural plans. GAO visited 12 parks in 3 different regions and found that 2 parks had no approved plans and 4 had not updated their plans since they were first approved in 1982 and 1983, respectively. Further, the Park Service had just started developing a process that could be used to analyze park-unit resource management plan data for making regional and servicewide budget and funds allocation decisions.

The Park Service's 11 initiatives were aimed at improving resource information, training staff in resource management, and increasing scientific research. The training initiatives were undertaken and are continuing. Of the remaining initiatives, one was never undertaken and the others were initiated but not carried through. Standards and guidelines for resource inventories and monitoring procedures, for example, were drafted but were not used. Also, plans to expand research programs were dropped for higher priority projects. On the other hand, although not part of its original set of initiatives, the Park Service has put into effect a national air quality monitoring program and established a national inventory of threats to parks from mining and mineral activities.

Documenting and Mitigating Threats

Neither the Park Service nor the individual park units kept track of their progress in addressing the threats identified in the State of the Parks report. The Park Service's budget for resource management

increased considerably between 1980 and 1984, from $44 million to $93 million. Within the 12 national parks GAO visited, additional funds were used to resolve some significant problems, such as the removal of plants and animals harmful to park resources and the repair of deteriorating historic structures. Nevertheless, officials of these 12 parks judged that 255, or 80 percent, of the total 318 threats reported in 1980, were still unresolved as of December 1985. Of these, 111, or about 43 percent of those remaining, were still undocumented—that is, the parks did not know the extent to which these perceived threats were problems, or the dimensions of those that were known problems.

Although the parks have proposed projects to address known and potential resource problems, many projects have not been funded. In the 10 parks GAO visited that had approved resource management plans, nearly 100 projects, intended to deal with deteriorating resources and threats to health and safety and provide more information about potential threats, were proposed to be funded in fiscal year 1986. However, none were funded. For example, at Death Valley National Monument funds were not approved to install protective nets over abandoned mine shafts. At Florissant Fossil Beds National Monument, no funds were provided to prevent further deterioration of petrified tree stumps. Likewise, no funds were provided to study the condition of rare, endangered, or threatened plant species in Hawaii Volcanoes National Park. Two of the 10 parks received about 25 percent of the funds and staff they requested in 1986, one received about 75 percent of its request, and another had only one of 7 projects funded.

Recommendations

To provide the information needed for the Park Service to develop a comprehensive, systemwide approach to protect and manage park resources and provide the basis to make more informed funding decisions, GAO recommends that the Secretary of the Interior direct the Director, National Park Service, to

- enforce the agency's requirement that resource management plans be prepared and updated in accordance with established Park Service guidance and criteria at each park and
- improve procedures on the use of the information provided in the resource management plans to (1) identify and prioritize cultural and natural resource management needs on a regional and servicewide basis and (2) prepare annual budget requests.

To ensure that resource management plans are based on adequate information, GAO is also making recommendations relating to the gathering and monitoring of data on the parks' natural and cultural resources. (See chapter 2.)

Agency Comments

In its comments on a draft of our report, the Department of the Interior believes that the report fairly addresses the questions the Subcommittee on National Parks and Recreation raised about the Park Service actions since the 1980 State of the Parks report, and it agreed with the thrust of the report's recommendations. The Department did state, however, that it believes the report neglected to emphasize in its recommendations that in taking actions to improve park information bases, the Park Service must not only make a one-time effort to collect baseline information, but must also establish long-term programs to monitor appropriate parameters for changes over time. GAO agrees with Interior and has added a recommendation citing the need for long-term resource monitoring programs.

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Abbreviations

CRS	Congressional Research Service
CPSU	Cooperative Park Study Unit
GAO	General Accounting Office
GMP	General Management Plan
NPS	National Park Service
PRIP	Park Restoration and Improvement Program
RITS	Resource Information Tracking System
RMP	Resource Management Plan
SRP	significant resource problem

Introduction

The National Park Service Organic Act of 1916 (16 U.S.C. 1) requires the National Park Service to

"...conserve the scenery and the natural and historic objects and the wildlife [within the parks]...in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

The national park system's original 35 units were large, rurally isolated areas that made this a relatively simple management charge. However, the system has grown significantly since 1916 and now includes urban parks and other park units[1] less than an acre in size. In the last 20 years alone, the national park system has tripled in acreage and almost doubled in the number of units. Today, the National Park Service is responsible for managing and protecting the natural and cultural resources on about 80 million acres in 337 separate units of the national park system. The Park Service defines natural resources as the scenic, atmospheric, hydrologic, geologic, paleontologic, floral and faunal components of the indigenous ecological systems. Cultural resources include historic and prehistoric sites, structures, and objects.

The expansion of the national park system has made the management charge to protect park resources more difficult and complex to achieve. Beginning in the 1960's and continuing to the present, conservation organizations have been concerned about the deterioration of the natural and cultural resources the Park Service is charged with protecting.

1980 State of the Parks Report

In July 1979, the Chairman, Subcommittee on National Parks and Insular Affairs, House Committee on Interior and Insular Affairs, requested the Park Service to provide an overview of existing and potential activities, emanating from either outside or inside park boundaries, that may be damaging or threatening the natural and cultural resource integrity of the national park system units. The Park Service issued a State of the Parks report in May 1980 which summarized and analyzed information on threats to natural and cultural resources of the national park system. Threats were defined as those pollutants, visitor activities, exotic species,[2] industrial development projects, or other influences that have the potential to cause significant damage to park resources.

[1]Includes national monuments, preserves, lakeshores, seashores, historic sites, memorials, and recreation areas.

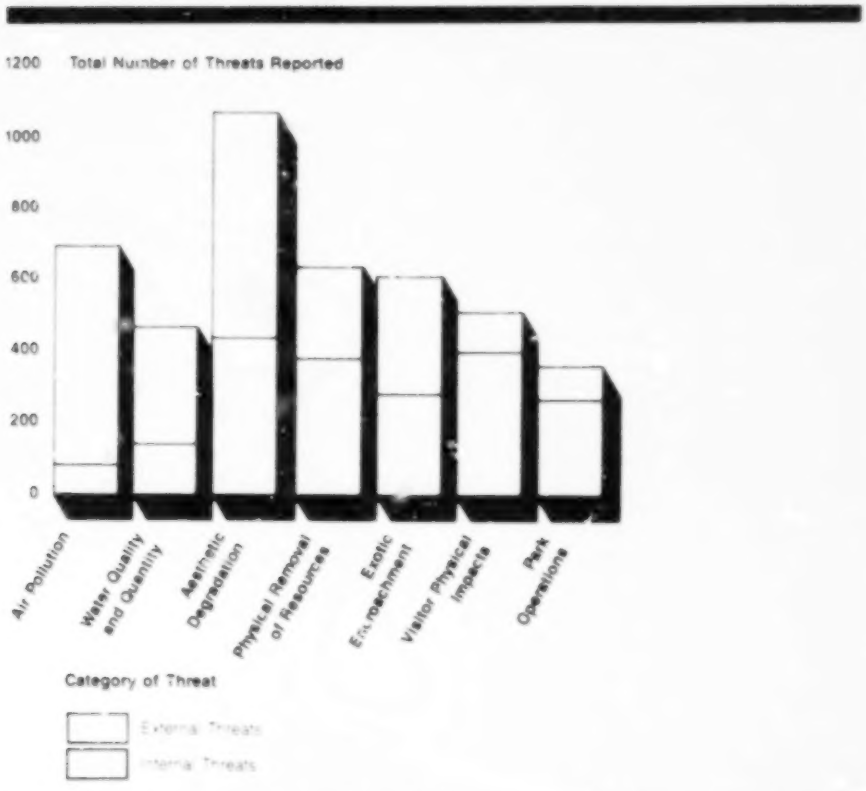
[2]Non-native species that can kill or destroy the habitat of native species.

The report was based on information obtained through a survey questionnaire sent to each National Park Service unit. The 260 park units that responded to the questionnaire identified a total of 4,345 existing or suspected threats in 75 different threat categories. The average number of threats reported by a unit was 14, with one unit reporting 64 threats. The reported threats fell into the following categories:

- aesthetic degradation from activities such as land development and timbering;
- air pollution caused by acid rain, hydrocarbon pollutants, etc.;
- physical removal of resources, for example, minerals extraction and poaching;
- exotic encroachment by animals, plants, noise, etc.;
- physical impacts caused by visitors, for example, erosion and habitat destruction;
- water quality changes/pollution caused by oil spills, toxic chemicals, etc.; and
- park operations, for example, utility corridors and misuse of pesticides.

The total number of threats reported in each major threat category is shown in figure 1.1. Also shown are the number of internal threats versus external threats.

Figure 1.1: Number of Threats by Major Threat Category



According to the report, more than 50 percent of the threats were attributed to sources or activities located outside of the parks. Further, 75 percent of the reported threats were considered inadequately documented by research. Based on these findings, the Park Service concluded that an expanded resource protection and preservation program was needed. The program would include

- a comprehensive inventory of each park's important natural and cultural resources and a park-level plan for managing these resources,
- accurate baseline data on park resources and comprehensive monitoring programs to detect and measure changes both in these resources and in the environment within which they exist,
- added attention to those threats that are associated with sources and activities located outside of the parks, and
- improved capability to better quantify and document the impacts of various threats.

In its 1980 report, the Park Service stated that it had insufficient staff and funds to implement such a program. In addition, the Park Service recognized that changes in priorities and reallocations of resources were required to meet its mandate to protect and preserve park resources.

The 1980 report was the Park Service's first systematic attempt to identify threats to park resources on a servicewide basis. While this report received technical criticism—primarily for failing to attach significance to the numerous threats reported and the limited discussion of cultural resources[2]—it did focus attention on resource management problems facing the Park Service. This focus brought about a significant increase in appropriations for resource management, from $44 million in fiscal year 1980 to $93 million in fiscal year 1984—a level generally maintained in fiscal years 1985 and 1986. As a percentage of total Park Service budget authority, this represented an increase from 8.3 percent to 10.6 percent.

1981 Servicewide Strategy to Prevent and Mitigate Resource Problems

After receiving the State of the Parks report, the Subcommittee Chairman, in July 1980, requested the Park Service to develop a prevention and mitigation plan that would address the problems noted in the report. The Park Service responded in January 1981 with its report to the Congress entitled State of the Parks: Servicewide Strategy for Prevention and Mitigation of Natural and Cultural Resources Management Problems.

The January 1981 report presented a two-phase prevention and mitigation plan. For the short term, the Park Service proposed to develop a set of natural and cultural resource management needs ranked in order of servicewide priority for inclusion in the fiscal year 1983 budget cycle. Over the longer term, the Park Service planned to (1) require that all park units have a current, comprehensive Resources Management Plan (RMP) approved by their regional office by December 1981 and (2) use these RMPs in formulating its annual budgets beginning with the fiscal year 1984 budget.

In addition, the Park Service included 10 initiatives, subsequently expanded to 11, in the January 1981 report. The initiatives were to provide (1) guidance to the park units on issues that should be incorporated into the RMPs, (2) additional training in natural resources management,

[2]The Park Service submitted a supplemental Threats to Cultural Resources report to the Subcommittee in April 1982.

and (3) the capability to determine, on a servicewide and regionwide basis, the severity of park resource problems, assess and prioritize those problems, and evaluate the effectiveness of the Park Service's resources management program. The 11 initiatives are outlined in appendix I.

According to the January 1981 report, the two-phase program, together with the initiatives, was designed to provide the Park Service with a mechanism for incorporating comprehensive park unit RMPs into a systematic servicewide planning process. According to the then Park Service Director, senior Park Service management would have, for the first time, a comprehensive and prioritized summary of those natural and cultural resource management issues that warrant major emphasis and a much improved basis for making informed resource management funding decisions.

In January 1981, each park unit had developed a list of its significant resource problems (SRPs). These lists were then analyzed at the regional level, and a prioritized list of regionwide SRPs was then prepared. In February 1981, the Regional Directors had reviewed these regionwide lists and established a servicewide SRP priority list. On the cultural resources SRP list, 63 projects were noted as highest priority and on the natural resources side, 38 projects were so designated. In September 1981, the Park Service sent the Congress a progress report on the status of its servicewide strategy. According to the progress report, the short-term phase of the strategy had been completed.

The servicewide strategy report stated that the Park Service would submit a second progress report in 1982. However, the Park Service provided no additional progress reports to the Congress. In August 1986, the Associate Director for Natural Resources, who was responsible for the servicewide strategy report, said he was uncertain as to why a 1982 progress report was not issued. However, he added that, through appropriation and legislative oversight hearings, the Park Service has provided the Congress all information requested concerning the state of the parks.

The Park Service's fiscal year 1986 budget documents stated that the Park Service was still committed to its resource management strategy as outlined in 1981. Then on April 29, 1986, the Park Service Director announced an action agenda to implement a broad 12-point plan for improving the Park Service. According to the Assistant Secretary for Fish and Wildlife and Parks, many of the 11 original initiatives were replaced by action items in this action agenda. Proposals in the action

agenda that directly relate to resource management would require the Park Service to

- develop a nationwide, systematic resource management strategy;
- develop usable resource inventories for each park;
- pursue cooperative agreements with adjacent landowners and managers to protect park resources; and
- integrate research, resource management, interpretation, and public information efforts.

Interior's Authority to Address External Threats

While the State of the Parks report found that over 50 percent of the threats came from sources or activities located outside park boundaries, the Park Service's 1981 strategy did not specifically address external threats. The 1981 servicewide strategy report concluded that a substantially expanded program (not described in the report), augmented by favorable relationships with state and local governments, would be required to deal with external threats.

Several efforts have been made in the Congress since 1981 to give the Secretary of the Interior specific authority to protect park resources from external threats—notably from the land-use activities of other federal land-managing agencies. However, none of these protective initiatives have become law.

The Department of the Interior has opposed all of the legislative proposals, stating that sufficient authority to adequately protect park resources already exists. However, mounting concern within the Department about the effects of other federal land-managing agencies' actions on park resources did lead to the establishment of a Park Protection Working Group in April 1984. This group, consisting of representatives from Interior's four land-managing agencies (the National Park Service, the Bureau of Land Management, the Bureau of Reclamation, and the Fish and Wildlife Service) and the Department of Agriculture's Forest Service, was charged with researching the park protection problem, developing potential solutions, and recommending a policy position which Interior should adopt.

In June 1985, the Under Secretary released the working group's report. According to the report, the working group had redefined the issue from park protection to resource conflicts among agencies and had concluded that the best approach to the problem is to better anticipate, avoid, and if necessary, resolve these conflicts without establishing new systems

and programs. To that end, the report recommended improving and fine tuning existing agency processes. In this regard, the Under Secretary directed Interior's land-managing agencies to prepare action plans to implement the findings and recommendations of the report. As of January 1987, none of the agencies had submitted the required action plans.

A departmental manual release, dated October 20, 1986, made the task force's findings departmental policy, but the release did not require Interior agencies to implement new procedures. Instead, the release instructs the agencies to promote and encourage greater cooperation and coordination.

Objectives, Scope, and Methodology

By letter dated April 11, 1985, the Chairman, Subcommittee on National Parks and Recreation, House Committee on Interior and Insular Affairs, requested that we review actions taken by the Park Service since issuing the 1980 State of the Parks report. In subsequent discussions with the Subcommittee, we agreed to address the following questions:

- What has the Park Service done since 1980 to implement a servicewide approach to identifying, monitoring, and mitigating threats to park resources? (See ch. 2.)
- How are park units' resource management needs reflected in the units' resource management plans and the Park Service budget? (See ch. 2.)
- What actions have park units taken to carry out threats identification, monitoring, and mitigation activities? (See ch. 3.)
- Does the Public Trust Doctrine, contained in a 1978 statute (16 U.S.C. § 1a-1, Public Law 95-250) obligate the Park Service to intercede in actions taken by others, on lands outside park boundaries, that would affect park resources. (See app. II.)

The Park Service has a total of 10 regions and 337 park units. In order to provide broad geographic coverage and a diversity in the types of resources being threatened, the Subcommittee agreed that we would review four randomly selected park units in each of three Park Service regions—Western, Rocky Mountain, and Southeast. The Subcommittee also agreed that we would select the 12 park units as follows.

- From a list supplied by each regional director identifying the three national parks in the region with the most threatened natural resources, we would randomly select one national park.

- From a list supplied by each regional director identifying the three park units in the region with the most threatened cultural resources, we would randomly select one park unit.
- From a list of all park units in the region that have an operating budget and full-time personnel assigned, excluding the park units on the lists supplied by the regional director as described above, we would randomly select two park units.

Appendix III lists and provides certain information on the 12 park units selected for review. The Park Service Associate Directors for Natural and Cultural Resources reviewed the lists of park units selected and agreed these units were representative.

To determine what actions the Park Service has taken since 1980 to implement a servicewide approach for addressing threats to park resources, we reviewed pertinent documents at Park Service headquarters and interviewed resource management personnel involved in developing and implementing the servicewide approach for resource management at the headquarters, regional office, and park unit levels. To respond to the Subcommittee's second and third questions, we analyzed park, region, and servicewide planning, budgeting, and reporting documents and made selected park unit and regional office site visits to discuss these issues with resource management officials. At the park unit level, we analyzed resource management planning and budgeting documents and interviewed management officials to determine what actions the parks had taken to identify their resource management problems and to quantify the funds and personnel needed to address their identified resource management problems. We then contacted regional and headquarters level personnel to determine if they were aware of the park units' resource management problems and needs on a systematic basis and had taken appropriate action to address these problems and needs.

With regard to the Public Trust Doctrine question, we reviewed the doctrine and other relevant legislation and court cases involving activities on lands outside park boundaries affecting or potentially affecting park resources and values. We also reviewed Interior and Park Service documents addressing the issue and discussed it with Interior and Park Service personnel.

We performed our review in accordance with generally accepted government auditing standards. The work was conducted between October 1985 and August 1986 and updated thereafter as necessary.

Limited Progress Made in Implementing the 1981 Servicewide Strategy to Prevent and Mitigate Resource Problems

The Park Service had only partially implemented its 1981 servicewide strategy—developing a systematic, servicewide planning process; producing a comprehensive and prioritized summary of resource management issues; and improving the basis for making resource management funding decisions. In reviewing the resource management plans of the 12 park units we visited, we found that (1) not all park units had an approved RMP, (2) in one region none of the park units had updated their RMPs as required to reflect current conditions, (3) the RMPs did not present certain information required by the Park Service's guidelines for preparing RMPs, and (4) regional RMPs, prepared for the first time in February 1986, were not prepared in a consistent manner. As a result, Park Service managers have not had the information needed to obtain a complete, current, and consistent perspective on regional or servicewide resource management problems. In addition, although the Park Service had originally planned to use the RMPs as the basis for formulating its annual budget requests beginning with the fiscal year 1984 budget, it had not developed the procedures needed to use the park unit RMP data in formulating the agency's annual budget.

The Park Service's servicewide strategy also included 11 initiatives designed to complement the development and use of the RMPs. We found that 10 of the 11 initiatives were started, but 7 of those were subsequently dropped. One that was dropped was subsequently restarted. Two others that were dropped, and the one that was never started, are currently included in the Park Service Director's 12-point action plan.

One of the deficiencies the initiatives were to address was the lack of basic information about park resources described in the 1980 State of the Parks report. However, this problem still exists. As a result, the Park Service does not have complete knowledge of what resources it has or the condition of those resources. This type of information would be needed to develop a factual basis for pursuing an adverse impact determination on potential or ongoing activities outside the parks' boundaries.

Not All Parks Had Prepared or Updated Resource Management Plans as Required

The Park Service had required park units to have an approved RMP before expending funds for resource management or research prior to 1980. However, the State of the Parks report stated that only 1 of 3 parks had an approved RMP. The report also stated that existing guidelines did not adequately address current issues and problems, provide a concise and systematic framework for problem prevention and mitigation, nor provide a commitment to a comprehensive park resources management program. Consequently, revised guidelines were issued in December 1980, and all park units were directed to prepare RMPs or revise existing RMPs in accordance with the new guidance by December 1981.

The Park Service's goal of having an approved RMP in every park unit by December 1981 was not met. As of August 1986, 31 park units did not have an approved natural RMP and 35 parks did not have an approved cultural RMP. Also, many approved RMPs had not been updated annually to reflect current resource conditions as the Park Service's guidelines required, and the RMPs we reviewed did not present certain information required by these guidelines, thereby limiting their usefulness as a management information tool above the park-unit level.

Table 2.1 shows the status of RMPs for the 12 park units we visited, as of August 1986. Two of the parks—both in the Rocky Mountain Region—had not prepared natural RMPs and none of the four parks in that region had prepared cultural RMPs.

Table 2.1: Status of RMPs at Parks Visited

Region/Unit	Year RMP approved		Year(s) RMP updated	
	Natural	Cultural	Natural	Cultural
Rocky Mountain				
Glacier	1983	None	None	
Custer	None	None		
Grant-Kohrs	None	None		
Florissant	1983	None	None	
Western				
Hawaii	1982	1985	1983, 1984, 1985, 1986	1986
Death Valley	1981	1981	1983, 1985	1983, 1985
Redwood	1982	1982	1984, 1986	1984, 1986
John Muir	1981	1981	1983, 1985	1983, 1985
Southeast				
Cape Hatteras	1983	1983	1984, 1985, 1986	1984, 1985, 1986
Wright Brothers	1983	1983	None	None
Stones River	1982	1982	None	None
Great Smoky	1985	1985	1986	1986

What Is a Resources Management Plan?

The National Parks and Recreation Act of 1978 (sec. 604, Public Law 95-625) requires each park unit within the national park system to have a General Management Plan (GMP). GMPs set forth each park unit's basic management objectives and identify strategies for managing resources and controlling visitor use, in order to achieve identified management objectives. For example, a basic management objective at Stones River National Battlefield is to maintain the historic scene. Strategies to accomplish this objective include landscaping, mowing, and removing vegetation introduced since the battle. After a GMP is approved, it guides the overall management of the park. As the name implies, however, a GMP provides only a general management approach. When a park needs more specific guidance or direction to implement or elaborate upon the strategies described in its GMP, the park is to prepare an action plan. One such action plan is the RMP.

The RMP, usually prepared at the park level by the superintendent and park staff, documents the extent of a park's resources and describes a comprehensive program for identifying, monitoring, researching, and managing the park's resources. Most parks have both natural and cultural resources and each is addressed in separate sections of the RMP. (Some parks prepare two RMPs, one for cultural resources and one for

natural resources.) Both sections describe the park's resource management needs and contain a series of project statements. The project statements describe all the park's ongoing and anticipated resource activities, including a description of each issue or problem, alternative actions that could be taken and their impacts, and a recommended course of action. (See app. IV for an example.)

The RMP also contains separate 5-year programming sheets for the natural and cultural programs. These sheets are supposed to itemize, schedule, and prioritize the 5-year funding and staffing requirements for carrying out the actions recommended in the project statements. For example, the natural RMP for Hawaii Volcanoes National Park included 51 projects with a total estimated cost of about $9 million over the 5-year period. For each project, the programming sheet listed the project title, the type of project (mitigation, research, or monitoring), the priority assigned to the project, the reference number of the funding request submitted to the regional office, the estimated cost of the project for each fiscal year, and the proposed source of funding within the agency budget.

The RMPs are reviewed by regional program specialists, such as the chief scientist and regional archeologist and, if acceptable, are approved by the Regional Director. Park Service planning guidelines require the parks to update their plans annually.

Plans Not Completed on Time

While the Park Service had made progress in completing RMPs, the goal of having an approved RMP for each park unit by December 1981 was not met. In 1979, the Park Service found that only one-third of the park units had an approved RMP. Subsequently, about half of the park units met the December 1981 target date for having an approved RMP prepared in accordance with the revised planning guidance published in 1980. According to information obtained from the Associate Director for Natural Resources in August 1986, of the 306 park units required to have an approved plan for natural resources, 275 units had complied by December 1985. According to the Associate Director for Cultural Resources, all 337 park units are required to have an approved plan for cultural resources. As of August 1986, 302 units had complied.

Park Service requires each park unit to have an approved RMP to obtain project funding from servicewide accounts controlled by headquarters, including the Natural Resource Preservation and Cultural Resource Preservation accounts, which totaled about $60 million from fiscal year

1982 through fiscal year 1986. However, this requirement was not always complied with. For example, during our visit to Grant-Kohrs Ranch National Historic Site, we found it had received about $500,000 in servicewide cultural resources project funding during fiscal years 1982 through 1985 without having an approved cultural RMP. Rocky Mountain Region officials explained that Grant-Kohrs and most of the other park units in the region were given blanket approval for what they called an interim cultural RMP. These interim plans consisted of a loose-leaf binder for each park unit, containing the unit's enabling legislation and forms (10-238s) requesting project funding. This blanket approval allowed the park units to obtain project funding while they were working on their RMPs. We believe this action, however, may have removed any incentive for the park units to complete RMPs in accordance with established guidelines. As of January 1986, 70 percent (26 of 37) of the park units in the Rocky Mountain Region, including the 4 units we visited, still did not have an approved cultural RMP. According to the region's Deputy Director, all parks would be required to complete their RMPs by the end of fiscal year 1987.

When we discussed the region's use of interim RMPs in lieu of approved RMPs with the Park Service's Associate Director for Cultural Resources in March 1986, he said that he was unaware that this had occurred, but would follow-up on the matter. As of August 1986, according to the Associate Director, one-half of the Rocky Mountain Region parks had approved RMPs and satisfactory progress was being made on the remaining RMPs. The Associate Director also said that he planned to continue to follow-up on the matter.

The eight park units we visited in the Western and Southeast regions had approved RMPs for both natural and cultural resources.

Plans Not Updated as Required

Periodic updating of the RMPs assures that they reflect current resource conditions and integrate the results of completed and ongoing projects. The updating also allows park staff to develop approaches to new or emerging threats and insure that the funding portion of a plan is modified to reflect actual funding received. Although the Park Service requires RMPs to be updated annually, we found that this was not always being done in the three regions we visited. In the Rocky Mountain Region, neither of the two approved RMPs had been updated since their initial completion in 1983. For example, the Glacier National Park natural RMP was approved in May 1983 and had not been updated as of August 1986 even though the park had five scientists and five resource

management personnel during this period who had been working on resource management problems. In addition, the park had received over $300,000 in servicewide project funds to address resource management problems. Thus, while work had been done at Glacier, the RMP had not been updated to reflect the actions taken and current needs. According to the Deputy Director of the Rocky Mountain Region, the region would first concentrate its efforts on obtaining completed RMPs from all parks; when that is done the region will take steps to ensure that RMPs are updated.

Three of the eight parks we visited in the Western and Southeast regions had updated their RMPs annually, as required, but the others had not. For example, in the Western Region, Hawaii Volcanoes National Park had updated its plan annually, while Redwood National Park, Death Valley National Monument, and John Muir National Historic Site had updated their approved plans every 2 years. In the Southeast Region, Great Smoky Mountains National Park and Cape Hatteras National Seashore had updated their plans annually, while Wright Brothers National Memorial and Stones River National Battlefield had not updated their plans since they were approved in 1983 and 1982, respectively. According to the Southeast Regional Director, the region does not insist upon updates from the smaller parks where resource conditions and budgets are relatively stable from year to year.

According to the Associate Director for Natural Resources, the RMP is a dynamic working document that must be updated annually to reflect changes in the factors affecting resources. However, the Associate Director said completing and updating RMPs is a regional responsibility and is not monitored by headquarters. On the cultural resources side, the Associate Director said that plans must be updated and that current guidance for cultural resource planning requires that the 5-year programming sheet be updated annually and the rest of the plan updated as necessary.

Guidance Not Followed in Preparing Plans

A properly prepared RMP contains information about a park's resource management problems, what is being done to address those problems, and the additional staff and funds needed to effectively address the problems. To be useful as a management tool above the park level, this information must be prepared and presented in a consistent manner. In March 1983, after reviewing a sample of RMPs prepared in accordance

with the 1980 planning guidelines, the Park Service issued revised guidance to clarify and standardize how information should be presented on the 5-year programming sheet.

None of the approved RMPs we reviewed contained a 5-year programming sheet that complied with the guidelines. While most RMPs showed the estimated amount of funds needed to accomplish proposed projects, they did not show the number of staff years needed to do the work. Also, most RMPs did not show which portion of the work could be done within existing park funding levels and what portion required additional funding.

In December 1980, the Park Service Director delegated to the regional directors the responsibility for reviewing RMPs for quality and consistency. The Associate Director for Natural Resources told us that the quality of the plans he had seen was not very good. According to the Associate Director, the poor quality was indicative of the park-unit staffs limited knowledge about and experience in natural resources management and that this situation should improve if the Park Service continues to provide its staff with needed training. The Associate Director also said there are no plans to require headquarters review of natural RMPs. The Associate Director for Cultural Resources told us he planned to revise the servicewide cultural resource management guidance to provide a standardized format for cultural RMPs and provide for headquarters review and comment on all cultural RMPs beginning in fiscal year 1987. Regional Directors, however, will retain responsibility for final approval of RMPs.

Limited Use of Resource Management Plans in Preparing Annual Budgets

Although the Park Service intended to use park-unit RMPs in the formulation of annual budget requests beginning with the fiscal year 1984 budget, it only recently developed procedures for regional RMPs that can be incorporated into the annual budget process. Recognizing that a systemmatic process was needed for identifying and prioritizing resource needs agencywide, in late 1985, the Park Service instructed the regions to submit regional natural RMPs for the first time. While these regional natural RMPs were not used in the budget preparation process, the Associate Directors for Natural and Cultural Resources said that beginning in 1987 regional RMPs will be required for natural and cultural resources, and the RMPs will provide an informed basis for budgeting and allocating funds.

At a Regional Directors meeting in 1985, the Park Service Director said that ". . .it is very important that we have a systematic process for identifying and prioritizing natural resource needs, and that this process be used in a consistent manner by all Regions." As a result, regions were required, for the first time, to develop regional RMPs for natural resources in accordance with criteria developed at headquarters. The regional RMPs, submitted to headquarters by March 1986, were to be used for ". . .prioritizing natural resource needs on a servicewide basis. . ." and to ". . .provide an informed basis for allocating available funds to the highest priority natural resource needs of the Service."

The headquarters guidance stated that the regional RMPs were to prioritize the parks' natural resource projects based on the application of a standard set of 12 criteria. (See appendix V for a description of all 12 criteria.) However, there was no requirement on how the criteria were to be applied in the prioritization process. As a result, the regions used a variety of methods in preparing their plans. For example, the Rocky Mountain Region, where some park units did not have approved or updated RMPs, asked each park unit to review its project statements and rank each project on a scale of 1 to 10 against each of the 12 criteria. These scores were then multiplied by weighting factors set by the region for each of the 12 criteria to produce final scores. The top 100 scores then became the regional priority list submitted to headquarters. For the Western Region, where all park units had RMPs, regional natural resources staff used updated project statements and programming sheets from each park unit in the region. The 12 criteria were weighted (different weights than those used by Rocky Mountain) and used to determine high, medium, and low project priorities. The resulting scores were then adjusted by applying another weighting factor representing the relative degree to which each criteria was present. The resulting ranking was further refined by regional staff using subjective factors such as recent interagency agreements and health and safety factors. This process produced the final list of the top 100 projects submitted to headquarters.

The Associate Directors for Natural and Cultural Resources said that beginning in fiscal year 1987, the regions will be required to prepare annual plans for both natural and cultural resources using standardized criteria. Guidelines for preparing these annual plans were sent to the regions in October 1986, and the plans for 1987 are to be submitted by May 1, 1987.

According to Interior's comments on our draft report, the regional resource management plans—which the Park Service has now formally termed Regional Resource Assessments and Action Programs—constitute an important part of the Park Service's plan for developing a long-term resource management strategy. For example, the regional natural resource plans will contain information on resources management staffing, funding, planning, and activities; the adequacy of data on, the condition of, and threats to resources; and major regional issues. The plans also are to list regional unfunded resource management projects that the regions will rank using standardized criteria and weights, outline a 5-year program for addressing regional resource needs, and disclose the results of a threats survey conducted with a survey instrument that is being developed to provide more credible, current information on the status of threats.

The Department said that it is true that the Park Service has not used resource management plans at the headquarters level to prioritize resource management projects across regions and to develop an annual servicewide resources management budget. However, the Department also said that the regions and parks are increasingly using the plans as part of the budget formulation process to prepare their annual operating programs for park and regional base funds, to request increases in base funds, and to prepare requests for funds from servicewide funding sources, such as the Natural Resources Preservation Program.

Not All Resource Management Initiatives Were Completed

The Park Service's servicewide strategy included 11 initiatives designed to complement the development and use of the RMPs.

- Three initiatives were designed to improve the Park Service's resource management information bases.
- Three initiatives were designed to increase the resource management skills of park personnel.
- Two initiatives had improvements in the Park Service's science and research programs as their objectives.
- One initiative incorporated into the strategy was designed to satisfy a previous congressional request for information on the adequacy of park boundaries to protect park resources.
- The final two initiatives were designed to clarify existing Park Service guidance on classifying selected lands within a park for protection and to form teams of experts to respond quickly to emerging resource management problems.

In a September 1981 report to the Congress, the Park Service said it had made progress on 8 of the 11 initiatives; however, the other 3 initiatives were on hold, pending availability of funds. A second progress report that was to have been sent to the Congress in 1982 was never prepared. However, during oversight hearings on the state of the national park system by the Subcommittee on Public Lands and National Parks, House Committee on Interior and Insular Affairs, in February 1982, the Park Service Director testified on the status of the 11 initiatives and assured the Congress of the Park Service's commitment to follow through on its servicewide strategy. The Director testified that progress was being made on all but one initiative, which was discontinued due to budgetary constraints, and that most would be fully completed by the end of 1982.

As shown in table 2.2, 10 of the 11 initiatives were started. Seven of the 10 were subsequently discontinued; however, 1 was later restarted. The initiative that was never started and two that were started and discontinued are now included in the action agenda for carrying out the Park Service Director's 12-point plan.

Table 2.2: Status of the 11 Initiatives

Initiative	Started	Discontinued	Restarted	Continuing	Included in action agenda
Management Information Bases					
Park resource information bases	X	X			X
Servicewide information system for resource management	X	X	X	X	
Guidance on resource monitoring programs	X	X			
Resource Management Skills					
Increase natural resources training	X			X	
Increase cultural resources training	X			X	
Provide resource management specialists to parks	X			X	
Science and Research Programs					
Expand science and research capabilities					X
Review Park Service science program	X	X			X
Other					
Conduct park boundary studies	X	X			
Clarify land classification system	X	X			
Organize multidisciplinary response teams	X	X			
Total	**10**	**7**	**1**	**4**	**3**

Initiatives to Improve Resource Management Information Bases Not Completed

The 1980 State of the Parks report stated that the Park Service had a "severe" lack of basic information about park resources, a deficiency that limited its ability to properly manage and adequately protect its resources. In particular, this type of information would be needed to develop a factual basis for pursuing an adverse impact determination on proposed or ongoing activities outside the parks' boundaries. As the 1980 report concluded:

"The Park Service cannot remain on the sidelines and expect to reject proposed (other federal) agency projects merely because it poses a potential threat to park resources. . . (We) must have the factual data on which to base and to support (our) position, and enable us to argue it persuasively."

To address this problem, the Park Service planned three initiatives that would (1) assess and improve resource management information bases at the park level, (2) develop an automated resource management information base describing park problems on a servicewide basis and actions planned to correct those problems, and (3) provide guidance to the park units on appropriate systems for monitoring the condition of park resources.

Assessment and Improvement of Park Resource Information Bases

In its servicewide strategy report, the Park Service stated that systemic deficiencies existed in the park-level resource information bases. For example, in 1980 few if any parks had a complete inventory of their natural and cultural resources or had sufficient information about how their resources functioned to implement strategies for managing all important park resources. To improve park-level resource information bases, the Park Service planned to

- determine the completeness of each park's resource information base and then require each park to make improvements,
- require all parks to conduct resource inventories and perform studies on how the resources function within park environments, and
- develop servicewide guidelines and checklists that the park units would use to produce useful information on all significant park resources.

Although the Park Service developed draft guidelines and checklists to carry out this initiative, work on the initiative was dropped by early 1983. According to the Associate Director for Natural Resources, the initiative was dropped because it merely repeated what was already required in Park Service planning policy.

In the absence of a special initiative, the Park Service has made good progress—in the areas outlined above--with respect to certain resources but not others. Museum objects, for example, is a resource area where such progress has been made. Through the development and use of the Collections Management Report, the Park Service now has the basis for determining the completeness of the resource information base (National Catalog of Museum Objects) as it applies to museum objects. The Park Service also revised and streamlined its manual cataloging procedures for museum objects in 1984. As a result, the rate of production of cataloging records has doubled, thus reducing the backlog of uncataloged objects. With the completion of the computerization of the cataloging procedures in December 1986, an even greater increase in the rate of production is expected.

On the other hand, progress in the water resources area has been slow. The 1980 State of the Parks report identified over 450 threats related to park water resources. Even so, 2 years later—in August 1982—the Park Service's Water Resources Field Support Laboratory issued a Water Resources Report that noted the following.

- To date there has been no systematic, servicewide inventory and assessment of existing water resources data.
- There is no systematic, servicewide effort currently underway to identify critical high priority gaps in each park's water resource data base.
- Not one park has completed a water resource management plan more than 2 years after adopting a water resources planning program.

The Park Service established a Water Resources Division in fiscal year 1983 to better address servicewide water-related problems. As of August 1986, several park units had completed or were developing water resource management plans; however, there was no systematic, servicewide inventory and assessment of water resource data, nor a systematic, servicewide effort to identify critical data-base gaps.

Similarly, divisions were established to address resource problems related to mining and air quality. In 1983, the Park Service established the Energy, Mining and Minerals Division and, among other things, it was directed to inventory potential mining and mineral threats to park resources and to determine the effect of existing mining and minerals activities on park resources. The inventory was completed in 1985. The impacts assessment was scheduled to be published in October 1986, but it was still not completed as of January 9, 1987. On the other hand, the Air Quality Division has responsibility for an air quality program that

grew from $1 million in fiscal year 1980 to over $4 million in fiscal year 1986. This increase allowed the Park Service to increase the number of parks monitoring air quality and visibility and to intensify research on the impacts of air pollutants on park resources.

According to the Associate Director for Natural Resources, none of the parks in the national park system had developed the complete resource information base necessary to properly manage the resources the park is entrusted with protecting. However, the Associate Director also pointed out that Park Service planning policy, which has existed since at least 1978, does require the development of a resources information base and that the Director's recent 12-point plan to improve the operation of the Park Service does include an action item emphasizing the need to acquire adequate resources information. The Associate Director also said that, starting in 1987, the regions, as part of their regional RMPs, will be required to (1) assess what resources exist in the parks and assess the condition of those resources and (2) develop an action plan based on the assessments. In commenting on our draft report, Interior said that these regional RMPs constitute a systemwide effort to gather and assess resource data required to make management decisions and are being implemented as part of the Park Service's management by objectives system.

The 12 parks we visited had collected some resources information; however, this was usually accomplished as a by product of other projects undertaken to address a known problem. The resource management personnel we talked to agreed that basic resources information was important and should be gathered, but they said efforts to do so were hampered by difficulties in obtaining funds for projects to gather information, lack of guidance in what and how much information should be gathered, and a general lack of emphasis on this area by Park Service management.

Resource management officials at the three regions we visited also agreed that basic resource information was important and that the "severe" lack of basic information about park resources described in the 1980 State of the Parks report still existed. As one official in the Southeast Region stated:

"There is a severe lack of resource baseline data, scientific/research studies, and monitoring activities for virtually all park units. Our current management plans, e.g., resource management plans, general management plans, land protection plans,

development concept plans, etc., are frequently of limited value for strategic planning and resource decision purposes because they often are prepared without first collecting the necessary resource data."

Servicewide Information System for Resource Management

In the State of the Parks report, the Park Service stated that there was no accumulation and analysis of resources management information above the park level and little exchange of resources management information between park units. The Park Service's former Natural Resources Division Chief, in the March 1982 issue of Park Science, described the situation where significant resources management information existed but was not available when needed as a "case of gross malfeasance."

To correct this problem, the servicewide strategy report proposed developing an automated Resources Information Tracking System (RITS). The system would contain the project statements, which detail funding and personnel needs, from all park unit RMPs. RITS would also track these projects through to completion, providing servicewide information on management, monitoring, and research actions that are both underway and anticipated. Report abstracts on all completed projects would also be included in the system and would be available to other parks with similar problems.

In 1982, the Park Service awarded a contract to design and develop RITS, but the project never progressed beyond the design phase and was dropped in 1983. According to the Associate Director for Natural Resources, he stopped work on RITS because it was poorly designed and was not received well by potential users. The Associate Director said the system, as designed, was not adaptable to the parks' computer equipment and using it would have required a substantial expenditure of funds for new equipment and training.

The concept of developing a computerized, servicewide resources information base was revived in 1985 as part of a computer system that is intended to include frequently requested information about each park unit, such as acreage, visitation, and land acquisition. This system will eventually contain, according to the Associate Director for Natural Resources, natural resource data for individual parks, such as significant resource features, status and availability of baseline information, threatened species, and significant natural and cultural resource problems and threats. In addition, according to a March 1986 memorandum from the Director to all regional directors and park superintendents,

other park-specific data, such as ongoing research projects, prioritized resource funding needs, and science abstracts, will be added in the future.

Guidance on Resource Monitoring Programs

In 1980, the Park Service began analyzing potential programs for monitoring the condition of the parks' natural and cultural resources to see if any could be developed to meet servicewide resource monitoring needs. Information obtained from monitoring resources would allow the Park Service to develop data bases, measure changes in resource conditions, and assess the significance of these changes. In 1981, as part of its servicewide strategy, the Park Service said that it planned to select the most appropriate monitoring programs and use them to formulate servicewide guidelines for park-level monitoring efforts. The Park Service said these guidelines would provide continuity and consistency to this extremely important part of the Park Service's natural resources program.

While Park Service headquarters staff performed some initial work on this initiative, by early 1983 it had been dropped. According to the Associate Director for Natural Resources, this initiative was dropped because many park units did not have the scientific expertise necessary to provide continuity and consistency for this complex effort. However, according to the Associate Director, the Park Service did establish separate divisions for air, water, and energy and minerals which have responsibility for establishing monitoring systems for their respective areas.

Initiatives to Improve Park Service Resource Management Skills Have Progressed

Three of the Park Service initiatives included plans to improve the agency staffs' ability to more effectively address resource management problems. According to those initiatives, the Park Service planned to (1) increase the amount of training available to current natural resources management personnel, (2) provide more cultural resources management training, and (3) develop a trainee program to provide additional natural resource management personnel at the park level. The Park Service started and is continuing to implement all three initiatives.

Increased Training for Resource Management Personnel

In its servicewide strategy report, the Park Service stated that personnel responsible for managing park resources did not possess adequate experience and knowledge to effectively address current resource management problems. To correct this, the Park Service said that it planned

to expand the amount of resources devoted to natural resources management training. Later, the Park Service added plans to implement an expanded cultural resources management training program.

Training in natural and cultural resource management has increased considerably. Servicewide funds devoted to such training increased from about $200,000 in fiscal year 1982 to nearly $500,000 in fiscal year 1986. Also, the Park Service offered 25 resources management courses in fiscal year 1986, almost double the number of courses available in fiscal year 1982. Servicewide training has also been supplemented by area or problem-specific training in each region.

One example of the expanded training is in the area of museum collections management. Since 1980, the basic training course provided to park personnel who are responsible for managing museum collections has been expanded from 1 week to 2 weeks and a new annual course has been developed for mid-level curators that provides information on new developments in collections management and focuses on different topics each year. In addition, training on a revised system for cataloging museum objects has been provided in the training program of each region.

The Park Service intends to do even more, however. According to a March 1986 memorandum from the Director to all regional directors and park superintendents, data collected in 1985 showed that park staff involved in natural resource management activities have participated, on the average, in only one 40-hour natural resource training course every 5 to 6 years under the servicewide training program. The Director characterized this as "unacceptable" and said that by fiscal year 1987, every individual whose primary duties are natural resource management will have an opportunity to attend at least one servicewide natural resource management course annually.

Training to Provide More Resource Management Specialists to the Parks

The State of the Parks report stated there was a severe shortage of natural resource management specialists working in the parks. To alleviate this shortage, the Park Service, in its servicewide strategy report, planned to implement a training program for natural resource specialists that would enable the Park Service to place well-qualified resource managers in every major natural resource area in the national park system in the quickest time possible. The Park Service's plan was to initiate this program with 30 trainees in fiscal year 1982 and to begin a new training cycle each year through at least fiscal year 1990. These trainees would

receive comprehensive classroom and on-the-job training for 18 to 24 months, in such subjects as backcountry management, insect diseases and control, animal and plant restoration, and wildlife and fisheries management.

Funding for this initiative was first sought and obtained in fiscal year 1982. As of October 1986, two training cycles had been completed and about 60 specialists placed in the parks.

At a meeting in January 1986, the regional directors voted to terminate this program because they considered it too costly—about $1 million a year. However, according to a survey done by the Associate Director for Natural Resources in April and May 1986, some 190 natural resource specialists were identified by the regional directors as needed by the parks, with over 40 percent of this total ranked as high priority. As a result, in July 1986 the Director decided to continue with a scaled-down program. He announced that a new class with 20 trainees would start in fiscal year 1987, but the trainees would receive training during 1 year rather than the 2 years received by previous trainees.

Initiatives to Improve and Expand Park Service Science Program Not Completed

The State of the Parks report stated that the level of science program activities in 1980 was "completely inadequate" to cope with the broad spectrum of resource management problems facing the parks. According to its servicewide strategy report, the Park Service planned to address this problem by (1) expanding cooperative research relationships with universities and (2) having its science program examined by the National Academy of Sciences. Neither initiative was completed, but both are included in the Director's 12-point action agenda.

Cooperative Park Study Units

In the State of the Parks report, the Park Service noted that the science and research activities supporting its resource management program were understaffed and underfunded. In its servicewide strategy report, the Park Service said that to responsibly manage its resources it must increase its scientific research capability. To accomplish this, the Park Service planned to expand its science program capabilities through greater use of Cooperative Park Study Units (CPSUs). CPSUs are university-based programs which, under cooperative agreements with the Park Service, facilitate research and provide technical assistance to parks. For example, the Park Service has an agreement with the University of Hawaii's Department of Botany which, through research projects, helps Hawaii Volcanoes National Park to resolve or control problems caused

by an over-abundance of non-native plants. Under this initiative, the Park Service planned to

- assess the effectiveness of existing CPSUs,
- determine how to increase the staffing and funding for existing CPSUs, and
- seek specific legislation to authorize and fund the establishment of additional CPSUs at strategic locations.

According to the Associate Director for Natural Resources, funding for this initiative could not be obtained due to higher priority work at headquarters. The number of participating CPSUs has decreased from 27 in 1981 to 20 in 1986, and the number of Park Service scientists conducting park-related research has declined from 103 in 1980 to 100 in 1986.

Review of the Park Service Science Program

In October 1980, at the request of the Park Service, the National Academy of Sciences presented a proposal for an in-depth review of the Park Service's science program. The proposed 18-month, $300,000 study would have examined all aspects of the science program, including its organization, staffing, budget, and the program's relationship to natural resources management.

According to the Associate Director for Natural Resources, while the Park Service had planned to proceed with the Academy's proposal as part of its servicewide strategy, in 1982 this initiative was dropped from further consideration due to budgetary constraints. However, he also said that a science program review, including an assessment of the CPSU function, is being proposed as part of the action agenda that implements the Director's 12-point plan to improve the Park Service.

Initiative to Conduct Park Boundary Studies Not Completed

In its servicewide strategy, the Park Service noted that the boundaries of many historical and archeological parks did not protect significant resources because the current boundaries either excluded some of the resources the park was established to preserve or provided an area too small to protect the resources from external threats. For example, the Stones River National Battlefield includes only 351 acres of the 3,700-acre Civil War battlefield. According to the park superintendent, a key cultural resource—the foundation of the house used as a hospital by both the North and the South during the battle—is adjacent to the park, but in private ownership. A boundary change would allow the park to preserve and open this resource to the public.

The House Subcommittee requesting the servicewide strategy report had previously asked the Park Service for a report on the adequacy of park boundaries to help the Subcommittee evaluate legislative proposals for boundary changes. As a result, the Park Service incorporated this congressional request as an initiative in its servicewide strategy report. Under this initiative, the Park Service planned to study the boundaries of 190 historical and archeological parks to determine the area needed to adequately protect significant park resources and recommend the acquisition of any additional land necessary to obtain such protection.

Although regional offices completed pilot studies for this initiative, headquarters did not request the results of the pilot studies or instruct the regions to complete studies at all 190 parks. According to the Associate Director for Cultural Resources, he did not know why the boundary study initiative was not completed or why the Park Service had not responded to the Subcommittee's request. He also said that the Park Service had no current plans to complete the boundary study initiative.

Initiative to Clarify Land Classification Systems Not Completed

Heavy visitor use was one of the most frequently cited internal threats to park resources, according to the State of the Parks report. To address this problem, the Park Service had previously developed the management techniques of site designation and management zoning. Through site designations, such as research and monitoring areas, parks are able to specify activities allowed in threatened areas. Through management zoning, parks can establish special protection zones for fragile or rare resources where visitor use and park management activities are restricted or prohibited.

However, in its servicewide strategy report, the Park Service said that park personnel were confused about the purpose, use, and relationship of site designations and management zoning, and that the Park Service had not emphasized these systems enough for them to be effective in protecting resources from excessive visitor use. As part of its servicewide strategy, the Park Service planned to clarify and improve servicewide use of site designations and management zoning by

- issuing guidelines for using the systems, together with new and revised designation categories;
- emphasizing use of the systems to protect fragile, rare, and unique resources; and

- encouraging the establishment of more designated areas for observational and experimental research.

The Park Service, however, did not follow through on this initiative. According to the Associate Director for Natural Resources, headquarters developed working drafts and sent them to the field for the park units use if they wished. According to the Associate Director, no additional work was done on this initiative because he believed the objectives of this initiative were already adequately addressed in Park Service planning guidelines for General Management Plans. He also said that no follow up had been done to determine if the drafts were ever used.

Multidisciplinary Response Teams Not Created

Although many resource management problems can be remedied more easily if addressed early, the servicewide strategy report noted that (1) most parks did not have the necessary expertise to detect problems early and (2) the regional office staffs' responsibilities were too fragmented to allow them to respond quickly and effectively to the parks' requests for assistance. The report, therefore, stated that the Park Service would organize multidisciplinary teams of specialists that would be available to all park units, thus providing the units the broad experience and quick response they needed. These teams would be available for consultation and could interact with other organizations and agencies to help solve a park's resource problems. The servicewide strategy proposed that these teams

- serve as quick-reaction resource management teams, addressing selected problems on request,
- gather and monitor resource information to provide an early warning system for detecting park problems; and
- help develop regional strategies for problem mitigation.

According to the Associate Director for Natural Resources, funding was not available for this initiative, and it was left up to the regions to do this on an ad hoc basis with existing resources. Resource management officials at the regions we visited told us they have sent teams out to assist parks in addressing selected problems on request, and the regions have helped develop regional strategies for solving mitigation problems. However, the officials also said they do not have the resources to respond to all park requests for assistance or to gather and monitor resource information for the parks in order to detect problems before they become crises.

Conclusions

The Park Service had only partially implemented its 1981 servicewide strategy—developing a systematic servicewide planning process, producing a comprehensive and prioritized summary of resource management issues, and improving the basis for making informed resource management funding decisions. The cornerstone of this strategy—the development of resource management plans—has progressed more slowly than planned, with some parks still without approved plans as of August 1986. Among the plans we reviewed, many were missing required information and several had not been updated to reflect current conditions. In addition, although the Park Service had intended to use the park unit plans as the basis for formulating budget requests beginning with the fiscal year 1984 budget, it only recently developed procedures for regional RMPs that can be incorporated into the annual budget process.

While resource management training provided to Park Service staff has increased considerably since 1980, only one of the other eight management initiatives, that were intended to complement the development and use of the RMPs, was being worked on as of August 1986. None of the initiatives designed to improve the resources management information base—the most critical need identified in 1980—were completed, and the lack of basic information about park resources described in the 1980 State of the Parks report still exists. As a result, the Park Service does not have complete knowledge of what resources it has or what condition those resources are in. Not only is such information necessary for proper planning and management, as described by the Park Service itself, but it is also important to establish basic accountability for the resources that the Congress has entrusted the Park Service with protecting. Also, this factual data would be needed to develop a basis for pursuing an adverse impact determination on potential or ongoing activities outside the parks' boundaries.

The recent decision by the Park Service Director to require regional RMPs for natural resources for fiscal year 1986, and for both natural and cultural resources for fiscal year 1987, should provide Park Service management with the type of information necessary to identify natural resource needs on a servicewide basis and should provide for a more informed basis in budgeting and allocating limited funds to the highest priority projects. However, these plans will only be as good as the source used to prepare them, namely, park unit RMPs. Thus, the goal to have a systematic and sophisticated approach to resource management expressed in 1980 and in Park Service budget documents every year

since will remain unmet until all the parks have obtained adequate baseline data on their resources, prepared complete and consistent RMPs, and thereafter, updated their RMPs to reflect current conditions.

Recommendations

To provide the information needed for the Park Service to develop a comprehensive, systemwide approach to protect and manage park resources and to provide the basis to make more informed funding decisions, we recommend that the Secretary of the Interior direct the Director, National Park Service, to

- enforce the agency's requirement that RMPs be prepared and updated in accordance with established Park Service guidance and criteria at each park unit and
- improve procedures on the use of the information provided in the RMPs to (1) identify and prioritize cultural and natural resource management needs on a regional and servicewide basis and (2) prepare annual budget requests.

The quality of the RMPs depends on the adequacy of the resource information upon which it is based. Therefore, to ensure RMPs are based on adequate information and to establish basic accountability for park resources, we recommend that the Secretary direct the National Park Service Director to

- develop standards for determining the minimum baseline information needed to properly plan for the management and protection of park resources,
- assess the adequacy of each park's information base in relation to the standards so developed,
- take action to improve park information bases that are found not up to the standards, and
- develop and implement long-term programs to monitor resource condition changes over time.

Agency Comments and Our Response

In its comments on a draft of our report, the Department of the Interior said that the report fairly addresses the questions the Subcommittee on National Parks and Recreation raised about Park Service actions since the 1980 State of the Parks report, and it agreed with the thrust of the report's recommendations. However, the Department said that the report neglects to emphasize, in its recommendations, that in taking actions to improve park information bases the Park Service must not

only make a one-time effort to collect baseline information but must also establish long-term programs to monitor appropriate parameters for changes over time. We agree with Interior and have added a recommendation addressing the need for long-term programs to monitor resource changes.

The Department emphasized that the Park Service does view RMPs as important documents for the management of park resources, that it is attempting to strengthen the role of these plans in the agency's programming and budgeting processes, and that the guidelines for the plans are being reviewed to assure that they fully address budgeting and priority-setting needs. The Department also agreed that the Service has a fundamental need for baseline inventory data and that standards are needed to help all levels of management to determine the level of documentation needed based on the type of park and the significance of the resource.

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Limited Progress Made in Documenting and Mitigating Resource Problems

The Park Service did not track or followup on the 4,345 existing and potential resource threats reported in the 1980 State of the Parks report. As a result, we were not able to determine the extent of progress made in documenting and mitigating those threats servicewide. However, the Park Service has received increased funds for resource management activities since 1980, and we found that those funds had benefited the 12 park units we visited. Even so, the resource management needs of these parks far exceeded available funding. Consequently, the parks had deferred resource management projects, resulting in inadequate resource information, further deterioration of the resources, and potential threats to the health and safety of park employees and visitors. Further, without complete, current, and consistent RMPs and a process for using the RMP data in the budget process—as discussed in chapter 2—there was no assurance that the available funds were being spent on the most serious resource problems.

Progress in Documenting and Mitigating Threats Reported in 1980 Not Known

While we were not able to determine how much progress the Park Service had made in documenting and/or mitigating resource threats servicewide, we did develop this information at the park units we visited. From this information we determined that, while some progress had been made, many of the resource threats persist.

The park units we visited reflected servicewide statistics in that about 75 percent of their reported threats in 1980 were undocumented. According to park unit officials, as of December 31, 1985, 63 (20 percent) of the threats reported in 1980 had been resolved and an additional 61 had been documented. However, 255 (80 percent) were still unresolved and 111 of these had not been documented. (See table 3.1.)

Table 3.1: Status of 1980 Threats at Park Units Visited

Site	Total threats reported in 1980	Status in 1980 Documented Yes	Status in 1980 Documented No	Status in 1985 Documented Yes	Status in 1985 Documented No	Resolved
Glacier	57	4	53	19	35	3
Custer	8	5	3	3	0	5
Grant-Kohrs	31	13	18	11	11	9
Florissant	16	4	12	2	6	8
Hawaii Volcanoes	17	13	4	13	4	0
Death Valley	34	8	26	10	16	8
Redwood	48	15	33	27	10	11
John Muir	7	0	7	2	4	1
Great Smoky	41	1	40	28	13	0
Cape Hatteras	27	2	25	8	9	10
Stones River	18	17	1	16	1	1
Wright Brothers	14	1	13	5	2	7
Total	**318**	**83**	**235**	**144**	**111**	**63**
Percentage of total threats	100	26	74	45	35	20

It should be noted that the December 1985 status information provided in table 3.1 was not readily obtainable at the park units. The data represents the best judgment of the superintendent or resource management specialist we interviewed, who, in most cases, was not the individual that prepared the questionnaire for the 1980 State of the Parks report.

In addition, the threats reported as unresolved in 1985 include some that were potential threats in 1980 and remained potential threats in 1985. For example, Glacier National Park was threatened in 1980 by the proposed development of a coal mine north of its boundary in Canada. While the proposed development has not occurred, it is still a potential unresolved threat. Also, the superintendents and resource management specialists noted that some threats, such as those caused by acid rain deposition, visitor use, and weather, may never be eliminated.

Funds Devoted to Resource Management Have Increased

As noted in chapter 1, the State of the Parks report focused attention on resource management problems facing the Park Service. This focus resulted in an increase of appropriations for resources management, from $44 million in fiscal year 1980 to $93 million in fiscal year 1984, a level generally maintained in fiscal years 1985 and 1986. For fiscal year 1986, resources management received about $91.5 million in funds and about 1,850 staff years servicewide, or about 15 percent of the Park

Service budget and 11 percent of its personnel resources. Both natural and cultural resources management programs devote about 50 percent of their funds and 75 percent of their personnel to park level programs.

As a result of a 1980 GAO report, Facilities in Many National Parks and Forests Do Not Meet Health and Safety Standards, (CED-80-115, Oct. 10, 1980), Interior initiated a major 5-year program to repair and upgrade park facilities with serious health and safety hazards. For fiscal years 1982 through 1985, the Congress appropriated about $1 billion to fund this Park Restoration and Improvement Program (PRIP). While the scope of the projects eligible for PRIP funding included cultural resource management projects beginning in fiscal year 1982, natural resource management projects did not become eligible for PRIP funding until fiscal year 1983. Through fiscal year 1985, cultural resource projects received about $28 million and natural resource projects received about $23 million. These servicewide funds, controlled by headquarters and available to park units on a competitive basis, continued to be provided in fiscal year 1986 under the Park Service's Cultural Resource Preservation and Natural Resource Preservation programs.

About $20 million, or 70 percent, of the cultural resource preservation funds were used for fabric projects such as the stabilization or preservation of structures, with the remaining funds being spent on cataloging collections, archeological surveys, historic structures reports, and other research-type projects. Natural resource preservation funds were used primarily for mitigation projects such as removing non-native species, including wild burros and pigs; reintroducing native species, including the peregrine falcon; and rehabilitating natural areas. Other funds were used to support air and water quality monitoring, research, and baseline data projects.

Increased Funding Benefited Park Units Visited

Among the 12 park units we visited, 8 had received nearly $4 million in PRIP funds between 1982 and 1985, an amount that was instrumental in these parks being able to address some significant resource management problems. For example:

- At Hawaii Volcanoes National Park, the most significant resource management problem in 1980 was the presence of non-native wild pigs, whose activities were destroying the remaining native rain forest. The park obtained over $500,000 in PRIP funds during fiscal years 1983-1985 to begin an eradication program consisting of fencing, trapping, and hunting. According to the park superintendent, this program has been

successful in eliminating pigs from 6,157 acres and reducing the pig population to small numbers on 8,870 acres. The superintendent estimated that an additional $3 million is needed to solve the problem on the remaining 50,000 acres still inhabited by pigs.

- At Grant-Kohrs Ranch National Historic Site, the park was faced with badly deteriorating structures that were highly susceptible to fire. During fiscal years 1982-1985, the park received about $500,000 in PRIP funds to stabilize these structures and install a fire suppression system.
- In 1980, Death Valley National Monument reportedly was faced with over 2,000 wild burros, whose activities were destroying native vegetation, overusing limited water resources, and causing severe soil erosion. During fiscal years 1983-1985, the park received over $1 million in PRIP funds to successfully bring this problem under control. By the time this project was completed, in January 1986, over 5,000 wild burros had been removed from the park.

In addition to the PRIP funds, the parks we visited used a variety of other sources to address their resource management problems. For example:

- At Cape Hatteras National Seashore, the park has received about $450,000 in servicewide funds and regional cyclic maintenance funds that had been used to completely restore a historic structure that was in serious disrepair in 1980. In addition, the superintendent said that through public pressure, park staff efforts, and regional and headquarters support, the park has received a line-item appropriation for over $5 million to save the historic Cape Hatteras lighthouse which is threatened by erosion.
- At Redwood National Park, many areas in Redwood Creek basin have been successfully rehabilitated using funds authorized under Public Law 95-250. The law directed that a rehabilitation program be developed for some 48,000 acres in the Redwood Creek basin of the park and authorized appropriations of $33 million over a 10-year period ending in 1988. According to park staff, before these lands were added to the park in 1978, timber harvesting and related road construction had adversely influenced erosion rates, sediment deposition, and water quality within the entire basin. In addition, a grove of redwoods containing some of the tallest trees in the world was seriously threatened.
- At Custer Battlefield National Monument, the superintendent said the recent emphasis on resource management allowed for the addition of a critically needed historian at the park. In addition, using donations from the park historical association and volunteers, the park has completed

an archeological survey and inventoried and cataloged its collection of objects, photographs, books, and documents.

- At Glacier National Park, the most serious threats in 1980 involved potential activities outside park boundaries—i.e., proposed coal mining north of the park in Canada, logging to the west on national forest lands, and oil and gas exploration to the east and west. To address these potential threats, the park used base funds to gather baseline data on air and water quality for the last 4 years. This data will allow the park to predict, through modelling, and/or measure changes to these resources from proposed or actual development activities outside park boundaries.

Resource Management Needs Exceed Available Funding

While funding for resource management programs has increased, the natural and cultural resource management needs of parks continue to exceed available funding. As the Park Service stated in its budget justification for fiscal year 1986:

"The Service manages over 70,000 culturally significant properties, an estimated 10 million objects, and an, as yet, unknown number of archeological sites. Yet in many cases, little is known about the resources or how to ensure their protection."

In its 1982 supplemental report on threats to cultural resources, the Park Service estimated that over $1 billion was needed to bring all historic structures up to prescribed standards. Estimates were not available for what it would cost to inventory and catalog all objects, prepare historic structure reports and preservation guides for all historic properties, or complete archeological surveys at all parks that should have one. In its comments on our draft report, Interior said that estimates on the cost of cataloging the backlog of uncataloged museum objects would be available in December 1986. A document obtained from the Park Service's Chief Curator, dated January 27, 1987, stated that it will take about 30 years and an expenditure of about $33.3 million to catalog the backlog of uncataloged objects.

In February 1986, based on the recently prepared regional RMPs, the Park Service estimated unfunded natural resources management needs at over $121 million during the next 5 years, or about $24 million a year. However, this estimate is based on only the top 75 to 100 natural resource projects per region. The Western Region selected the top 100 projects out of more than 600 projects in the park units' RMPs. In the Southeast Region, only 74 projects in 17 parks were selected out of the 400 submitted by 54 parks in the region. In the Rocky Mountain Region, 100 of about 700 submitted projects were selected.

Needs at the Units We Visited

The resource management project funding and staff needs in approved plans at the parks we visited are many. For example:

- The Hawaii Volcanoes National Park plan showed needs of $1.8 million and 31 staff years to accomplish 34 projects in its fiscal year 1986 natural resources management program. The park received $372,000, or 21 percent of identified needs, and 9 staff years, or about 30 percent of identified needs. Only 6 projects were fully funded and 10 were partially funded at an average of 45 percent of identified need. Seventeen projects received no funding.
- The John Muir National Historic Site plan showed needs of $174,000 to accomplish seven projects in its fiscal year 1986 cultural resources management program. The park received $5,000, or about 3 percent of its approved needs. One project was funded.
- The Glacier National Park plan showed natural resource management needs of $857,000 and 37 staff years for fiscal year 1986. Glacier received no additional funds or staff in fiscal year 1986. On the cultural side, the plan showed additional needs of $205,000. The park received $52,000, or about 25 percent of its approved needs.
- The Great Smoky Mountains National Park plan showed needs of $3.5 million and 91 staff years to accomplish its fiscal year 1986 natural resources management program. The park received $2.5 million or 71 percent of identified needs and 70 staff years or about 75 percent of identified needs.

Impacts of Limited Funding

Each project statement within a RMP describes what will happen if the project is not done. At the parks we visited that had approved plans, 98 projects were scheduled for fiscal year 1986 but were not funded. The parks indicated the following types of impacts would occur if the resource problems were not addressed.

- Resource condition will continue to deteriorate or resource values will continue to be degraded (39 instances). For example, at Florissant Fossil Beds National Monument, petrified tree stumps undergoing substantial deterioration as a result of exposure to the weather must be held together by steel bands. Continued exposure to the elements will result in the eventual disintegration of the prime visitor attraction at this park. A project to address this problem, which was included in the plan for fiscal year 1986, was not funded.
- Lack of information to adequately protect and properly manage resources (54 instances). For example, at Hawaii Volcanoes National Park, over 85 percent of the plant species are endemic to the Hawaiian

Islands. Without adequate information on these species, threats to the plants cannot be systematically identified and informed corrective actions cannot be taken. However, a project to study the condition of these endangered, threatened, and rare plants, which was included in the approved plan for fiscal year 1986, was not funded.

- Threats to human health and/or safety may arise or will continue to persist (4 instances). For example, at Death Valley National Monument, abandoned mining operations have left open and unprotected mine shafts and entrances which, in the past, have resulted in a visitor death and frequent park rescue operations. However, a project to install protective fencing at these abandoned shafts and entrances scheduled for fiscal year 1986 was not funded.

Inability to obtain additional funding for needed projects creates a difficult situation for park management. According to the superintendent at Hawaii Volcanoes National Park, "We know what the problems are and what needs to be done to address those problems but cannot obtain the funds to take needed action." The superintendent also said that since the park is unable to manage and protect resources on a parkwide basis under current funding levels, it has retrenched its efforts to small isolated "special ecological areas" that can be intensively managed and protected within existing funding. The park has over 400 exotic plants that adversely affect resource values, but only the 10 most destructive ones can be addressed under current funding.

In the Western Region, four of the seven historic ships at Golden Gate National Recreation Area have been closed to the public because funding necessary to restore the ships to prescribed standards has not been made available.

Even if funds can be obtained to restore resources to prescribed standards, it may be difficult to obtain the funds necessary to maintain the resource at the standards so attained. For example, the superintendent at Cape Hatteras National Seashore told us that it is typical for the Park Service to spend funds on restoring structures; however, the funds needed for periodic maintenance are not provided. The Park Service has spent over $450,000 to restore a historic building at Cape Hatteras. However, the superintendent is concerned that the park will not receive the funds needed to properly maintain the structure since several of his requests for additional maintenance funds were denied in fiscal years 1985 and 1986.

Rocky Mountain Region parks have similar problems. They estimate that they need $1.4 million a year to maintain cultural resources at prescribed standards. However, in fiscal year 1985, the region received only $600,000, or about 41 percent of its needs. In addition, even though a recent Park Service task force report recommended that the cultural cyclic maintenance program be fully funded at identified annual needs of $15.6 million, the fiscal year 1987 budget justification submitted to the Congress requests a servicewide decrease of over $1 million, from $8.7 million to $7.6 million. According to the Associate Director for Cultural Resources, the Park Service has historically gone through very expensive cycles of fix up, allow to deteriorate, fix up, instead of fully funding needed maintenance.

In this regard, as a result of a 1984 GAO report, National Park Service Needs a Maintenance Management System, (RCED-84-107, June 1, 1984), the Park Service is implementing a system to plan, organize, direct, and review its maintenance activities to assure that its assets receive needed upkeep. According to the Park Service headquarters official responsible for this effort, the system will cover all maintenance programs and should begin by April 1987.

Without adequate funding, parks seek alternative ways to complete projects and obtain some level of resource protection. Where possible, most parks depend heavily on volunteers to assist in making at least some headway on needed projects. For example, at Stones River National Battlefield, unfunded maintenance needs for fiscal year 1986 were partially met using volunteers. Parks also actively solicit outside expertise from private organizations. For example, at Great Smoky Mountains National Park, the science unit has developed a brochure delineating the park's research needs to protect and manage its resources. This brochure is widely distributed to universities and private sector organizations to generate interest in doing research at the park. The park has been so successful in generating outside interest that over half the research is now non-Park Service funded. Other parks have been able to form cooperative research relationships with other agencies to combat common problems, thereby reducing the cost of research. For example, Hawaii Volcanoes National Park has a joint research project with the Forest Service and the state of Hawaii to study methods to biologically control an exotic plant that could ultimately destroy the park's rain forests.

In this regard, the Park Service Director issued a memorandum to all regional directors and park superintendents in March 1986 outlining a

number of things that could be done at little or no cost, within existing budget and personnel limitations, to help carry out resource protection and preservation. For example, concerning baseline inventories, the Director stated:

"Park natural resources cannot be managed properly unless we first know what those resources consist of, and their condition. The value of basic floras and faunas, as well as soils, geology, minerals, hydrology, and other baseline data cannot be overemphasized. . .This is the kind of project that local universities could participate in on a cooperative basis with but few funds for graduate students and partial support for a faculty member."

Conclusions

Although funding for resource management activities has increased considerably and some progress has been made in addressing the problems identified in the 1980 State of the Parks report, resource management funding and staffing needs identified at the park level and approved by the Regional Directors continue to far exceed current funding and staffing levels. As long as this situation continues, there will be continued deterioration of park resources, inadequate management information, and threats to health and safety. In addition, much of the increased funds provided to the parks for cultural resources management projects were used to restore historic structures to prescribed standards. To maintain the structures at prescribed standards will require additional cultural cyclic maintenance program funds.

As we stated in chapter 2, the Park Service has not fully implemented the servicewide strategy presented to the Congress in 1981. Without complete, current, and consistent RMPs and a process for using the RMP information to prepare the agency's annual budget request and make funding decisions, there has been no assurance the funds received were used to address the most serious resource management problems.

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Initiatives to Prevent and Mitigate Resource Management Problems

1. Develop information baseline standards that describe an appropriate inventory of significant natural and cultural park resources and provide guidance for setting information gathering priorities.

2. Develop special protection zone guidelines for designating selected areas within the parks for special attention in order to protect fragile or unique resources.

3. Conduct boundary studies of historical/archeological parks to determine the adequacy of the parks' boundaries with respect to protecting the prime cultural resources that the parks were established to preserve.

4. Develop biological monitoring and environmental indexes to provide guidelines for monitoring and reporting the condition of natural and cultural resources.

5. Provide natural resources management training for current employees to provide park superintendents and other park personnel with basic information relevant to implementing effective resource management practices.

6. Provide training for natural resource management trainees to add 30 highly qualified resources management specialists to the parks each year.

7. Establish early warning/consultation/response units, consisting of one or more highly trained interdisciplinary teams, that could provide special support to parks in dealing with important resource management issues.

8. Assess the structure and effectiveness of university-based cooperative park study units in supporting the resources management and the science functions of the Park Service.

9. Develop and implement a resources information tracking system to provide an automated capability to store and transfer servicewide natural resources and science data.

10. Have the National Academy of Sciences assess the capabilities and the limitations of the Park Service science program and its relationship to natural resources management.

11. Provide additional cultural resources management training.

GAO Position on the Public Trust Doctrine

Summary

We were asked to comment on the application of the "Public Trust Doctrine" to the park system. "Public Trust Doctrine" is the term commonly used to describe the obligations of the Secretary of the Interior in administering the park system. Although the name suggests that the Secretary is in a legal sense a fiduciary or trustee, such a view has not been endorsed by the courts and, as the following discussion makes clear, we do not wish to imply by the use of the term that we endorse such a view or that the Secretary has any duties with respect to the parks beyond those created by the applicable statutes. See Sierra Club v. Andrus, 487 F. Supp. 443 (D.D.C. 1980).

The Public Trust Doctrine does not obligate the Secretary of the Interior to intercede, in all cases, in actions taken by others outside park boundaries that would affect park resources. Rather, it gives the Secretary discretion to decide when interceding would be appropriate and useful. The Secretary, even when he chooses to exercise his discretion to intercede, does not have general statutory authority to control or influence actions outside the park system. Whether the Secretary can use federal or state common law to assert the same rights as any other landowner, such as injunctive relief against activities outside his property which are harmful to it, depends on the facts and circumstances of each case.

The Public Trust Doctrine is derived from the general statutory obligations imposed on the Secretary of the Interior by the Organic Act of 1916 and reaffirmed in a 1978 statute, 16 U.S.C. § 1a-1, Public Law 95-250. Although one characterization of the Doctrine is that the Department holds park resources in trust for the public and therefore has the duties and obligations of a trustee to protect the trust property on behalf of the beneficiaries, the Secretary, as a matter of law, has no duties with respect to the parks beyond those set forth in the statutes.

The 1978 statute is a general statement of principles which the Congress expects the Secretary to follow in administering the park system. One of those principles is to conserve the scenery and natural and historic objects in the System. (16 U.S.C. 1, incorporated by reference in 16 U.S.C. 1a-1.) The law also requires, in general terms, that protection by the Secretary of the areas in the System "be conducted in light of the high public value and integrity of the National Park System . . ." 16 U.S.C. 1a-1.

Certainly, the Secretary has a duty under the law to fulfill its purposes, including protecting the parks. However, whether performance of that duty requires him to intercede in actions outside the parks is within the

Secretary's discretion, and whether he has general authority to intercede in such actions is, as a general proposition, doubtful.

Discussion

1. Duty

Under the law, if the Secretary determines that a threat exists which, if left unabated, would substantially prevent or detract from the conservation of park values and the protection of areas in the system, and that his intercession is an appropriate response to that threat, then he may be said to have a duty to intercede, to the extent he has authority to do so. The Secretary has broad discretion to determine such matters as whether a threat exists, how great its impact is, and whether his intervention is an appropriate means to deal with it.

In a case involving Redwood National Park, the plaintiff, the Sierra Club, argued that the Secretary had an enforceable duty to exercise his powers to protect the Park from external threats. The court concluded that the statute establishing Redwood National Park (this was before enactment of the 1978 amendment) imposed a legal duty on the Secretary to use the powers given him "whenever reasonably necessary for the protection of the park and that it could review his exercise of discretion." Sierra Club v. Dept. of the Interior, 376 F. Supp. 90, 95 (N.D. Cal. 1974). A subsequent decision in the same case (398 F. Supp. 284 (N.D. Cal. 1975)), arguably suggests that the Park Service Organic Act of 1916 (16 U.S.C. 1) also creates such enforceable duties, but the issue is not squarely decided. (See Sierra Club v. Andrus, 487 F. Supp. 443 (D.D.C. 1980).)

Another court has held, and indeed Interior conceded, based on the 1978 amendment, that the Secretary "has an absolute duty . . . [derived from the relevant statutes] to take whatever actions and seek whatever relief as will safeguard the units of the National Park System." Sierra Club v. Andrus, 487 F. Supp. 443, 448 (D.D.C. 1980), quoting from S. Rep. No. 95-528,9 (1977). However, the department has "broad discretion in determining what actions are best calculated to protect Park resources," 487 F. Supp. at 448.

2. Authority

Even if the Secretary finds that a substantial threat exists, which he should attempt to deal with, neither the 1978 Act nor other general provisions of law give him any additional legal authority to intercede in

actions outside the parks. The legislative history of the 1978 Act provides some reason to think that the Congress did not intend to confer such authority, since a provision expressly doing so was deleted in committee.

Public Law 95-250, in addition to amending the Organic Act, expanded the boundaries of Redwood National Park to protect that park's resources from damaging land uses occurring outside the park. When Redwood National Park was established in 1968, its boundaries encompassed 58,000 acres but the most spectacular redwood grove along Redwood Creek was only narrowly surrounded by parkland. Visible evidence of the inadequacy of the park's boundaries was soon provided by extensive storm damage near the grove, attributable in part to logging outside of the park. In 1978, a congressional report concluded that the park boundaries established in 1968 were not adequate to preserve a manageable drainage unit capable of ensuring the survival of a varied and self-perpetuating redwood forest.

As a result, legislation was enacted which added 48,000 acres to the park and created a park protection zone outside the park's boundaries, in which land could be purchased either from a willing seller or, if not acquiring the land would result in extensive damage to park resources, by condemnation. 16 U.S.C. 79a-79q. While the bill which became Public Law 95-250 was under consideration, the Secretary of the Interior had sought the authority to regulate timber activities outside and adjacent to the Redwood National Park lands. The House of Representatives passed a bill granting the Secretary of the Interior authority to regulate directly private lands outside the parks and to sue to enforce such regulations. The Senate Interior Committee deleted that provision. The Senate committee was reluctant to grant what it regarded as a significant expansion of the Secretary's authority. S. Rep. No. 95-578 (1977). The House provision was not restored in conference.

Many activities authorized by statute occur outside a National Park Service (NPS) unit but on land also owned or managed by the Department of the Interior (DOI). A question arises as to how the directive of 16 U.S.C. § 1a-1 affects those activities. The pertinent language states:

"The authorization of activities shall be construed and the protection, management, and administration of these areas [of the National Park System] shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress."

16 U.S.C. § 1a-1

The legislative history of this provision does not unequivocally establish that it was intended to give Park system values precedence over other public land values outside the National Park System. The Senate Committee on Energy and Natural Resources, after announcing its support for the amendment to 16 U.S.C. § 1a-1 which included the language quoted above, stated that

"This restatement of these highest principles of management is also intended to serve as the basis for any judicial resolution of competing private and public values and interests in the areas surrounding Redwood National Park System."

S. Rep. No. 528, 95th Cong., 1st Sess. 8 (1977).

This statement is ambiguous; it is not at all clear that the competing values Congress meant in passing 16 U.S.C. § 1a-1 were public values within the Parks versus other public values outside the Parks.

The language of the statute itself is also ambiguous. A fair reading of the statute, insofar as it relates to the Secretary's authority, is that it applies only to his authority over activities occurring within the National Park units. If so, 16 U.S.C. § 1a-1 provides no additional guidance on how to deal with external threats to the units.

Arguably, a possible interpretation of 16 U.S.C. § 1a-1 is that it directs the Secretary of the Interior to consider the impact on any NPS unit of any action he is authorized to take or allow, including those outside the Parks. The language of section 1a-1 certainly does not compel that interpretation, however.

Morever, as the Associate Solicitor, DOI, points out in his memo to the Director, NPS, any interpretation of 16 U.S.C. § 1a-1 must take into account its final phrase. Excepted from the general prohibition of any activity that would have a detrimental effect on an NPS unit are those activities "as may have been or shall be directly and specificially provided by Congress." That phrase might well be read to refer to all laws that vest in the Secretary of the Interior the discretion to authorize certain activities, such as coal mining, on lands under his management. If that is so, 16 U.S.C. § 1a-1 does not, in and of itself, resolve the question of what should have priority in a particular situation—the park values threatened with a detrimental action or the detrimental action authorized by statute. Decisions on such cases will have to be made on an

individual basis, taking into account the provisions of the statute which authorizes the detrimental action.

Given these possible alternatives, we are not willing to say that an interpretation of 16 U.S.C. § 1a-1 which limits the Secretary's authority over external threats to NPS units arising on DOI-controlled lands is an unreasonable one. It is clear from 16 U.S.C. § 1a-1 that Congress expected that the resources of the National Park units be given a high degree of protection. We cannot unequivocally say, however, that Congress wanted that protection to be provided at the expense of all other authorized activities in all cases of conflict.

No subsequent legislation has expanded the Secretary's authority over activities outside the park system. Several efforts have been made in the Congress to pass legislation which would give the Secretary of the Interior specific authority to protect park resources from external threats, particularly those resulting from the land use activities of other federal land management agencies. The Department of the Interior has opposed all of the legislative proposals.

In 1982, as a result of oversight hearings on the magnitude and severity of threats to the natural and cultural resources of the national park system, the proposed Park Protection Act of 1982—which sought to strengthen the Park Service's ability to combat threats—was introduced. The bill passed the House by a large margin but was not acted upon in the Senate. The most controversial aspect of the bill concerned requiring that the Park Service's views be fully considered in conducting federal projects adjacent to park boundaries, if the projects might have an adverse impact on park resources. The bill was reintroduced in 1983 with the same result.

In February 1986, a bill (S. 2092) was introduced to provide for consistent federal actions affecting resources of the national park system. This bill calls for designation of park resource protection areas within or coterminous with federally managed areas that are necessary to protect and preserve park resources. Within these designated areas, no federal activity would be allowed unless the Secretary of the Interior determined that the activity would not degrade or destroy park resources. As of July 15, 1986, no action had been taken on this bill.

As pointed out by the Associate Solicitor, DOI, in a 1985 memorandum to the Director, NPS, although laws giving the Secretary regulatory authority over private lands inside the park system (inholdings)

arguably support jurisdiction over private lands outside it, the courts have yet to recognize such authority. On September 20, 1985, the Associate Solicitor responded to the Park Service Director's request for an analysis of the legal authority of the Department of the Interior to protect units of the national park system from the adverse effects of air pollution. In commenting on the provisions of the Organic Act and the 1978 amendment (16 U.S.C. 1a-1), the Associate Solicitor concluded that while the Secretary's responsibilities for protecting park resources have been identified, his means of acquitting them have not. According to the Associate Solicitor,

"For all of the foregoing reasons, the Organic Act, whether utilized independently or in conjunction with other laws, currently is neither a certain nor an expeditious tool for the protection of NPS units from the harmful effects of air pollution originating outside those units."

The House Committee on Interior and Insular Affairs asked the Congressional Research Service (CRS) in October 1985 to review the Associate Solicitor's memo. CRS concluded that the intent of the 1978 Act "may have been to precipitate more suits to protect the parks from harmful outside activities." CRS reconciles this with the deletion from the bill of authority to directly regulate private lands outside the parks by suggesting that the Congress expected the Secretary to act, not based on any additional statutory authority, but with the same authority that any landowner has. On this theory, Interior could, for example, seek an injunction to abate a nuisance on adjacent land. CRS concedes that the language of the 1978 Act may not be adequate if the purpose was indeed "to prod the Secretary into more vigorous action."

We did not find any court decisions which have interpreted the 1978 Act or the Organic Act in general to allow the Secretary, through regulation, to control external threats to Park Service units. The 1978 amendment to the Organic Act calls for the "protection" of the System's units. However, neither it nor its legislative history mandate or suggest what mechanisms the Park Service should use against these threats. Indeed, as discussed above, the legislative history of Public Law 95-250, which contained the 1978 amendment to the Organic Act, suggests that neither the Secretary of the Interior nor the Congress believed that the amendment delegated to the Secretary of the Interior the authority to regulate external activities.

For the foregoing reasons, we agree with the Interior Solicitor's opinion that existing legislation does not clearly grant to the Secretary of the Interior regulatory authority over activities occurring on lands outside Park Service units.

National Park Service Units GAO Visited

Region	
Rocky Mountain	*Glacier National Park *Custer Battlefield National Monument Grant-Kohrs Ranch National Historic Site Florissant Fossil Beds National Monument
Western	*Hawaii Volcanoes National Park *Death Valley National Monument Redwood National Park John Muir National Historic Site
Southeast	*Great Smoky Mountains National Park *Cape Hatteras National Seashore Stones River National Battlefield Wright Brothers National Memorial

* Randomly selected from lists provided by Park Service Regional Directors of units with the most serious natural and cultural resource problems. Others were randomly selected from the remaining park units in the regions.

Site	State	Acreage	Year established
Glacier	Montana	1,013,595	1910
Custer	Montana	765	1879
Grant-Kohrs	Montana	1,499	1972
Florissant	Colorado	5,998	1969
Hawaii	Hawaii	229,177	1916
Death Valley	California	2,067,628	1933
Redwood	California	110,128	1968
John Muir	California	9	1964
Great Smoky	Tennessee	520,269	1926
Cape Hatteras	North Carolina	30,319	1937
Stones River	Tennessee	351	1927
Wright Brothers	North Carolina	431	1927

Example of a Project Statement (From the Death Valley National Monument Cultural Resource Management Plan)

CULTURAL RESOURCE PROJECT STATEMENT

1.1 DEVA C-14 Stabilize Historic Mine Structures

1.2 Statement of Issue or Problem

Statement of Condition. The monument contains numerous abandoned mine sites many of which have debris, equipment, mine workings and structures. Most of the known sites have been surveyed by the National Park Service historians and/or archeologists. The properties possessing cultural significance on a local, regional or national level have been identified and 31 have been nominated for inclusion on the National Register of Historic Places. In addition, four properties are currently listed on the National Register.

Except for a few sites near heavily visited areas of the monument; such as Harmony Borax Works, Eagle Borax Works and the Keane Wonder Mine, the structures remaining on these properties have been left to benign neglect and are in various stages of deterioration. The harsh desert environment and, in many cases, remoteness from patrolled areas increases the detrimental effects of climate and vandalism. Because of these factors the historical fabric at the historic sites is being lost.

Some of the sites invlolved are located on paten mining claims or unpatented claims upon which personal property rights have not been cleared. Park Service action to stabilize historic remains on these properties is not possible without agreement with owners.

Current Management Action. The vast majority of abandoned mine sites with cultural significance are subject to a policy of "benign neglect". That is attempts are made to curtail vandalism during routine patrols; however, no attempt at stabilization are made. The exceptions to this policy are; Harmony Borax Works which is 1.5 miles north of the Visitor Center, Eagle Borax Works which is 15 miles south of the Visitor Center, and the Keane Wonder Mine which is 15 miles north of the Visitor Center.

Results of Current Action. The properties currently subject to "benign neglect" will continue to be vandalized and deteriorate under stress from environmental conditions. At exposed sites such as Cyty's Mill, Chloride City and Aguereberry's Camp vandalism and environment are acting to rapidly obliterate historic remains. At present rated of deterioration, it is estimated that the historic fabric will be lost at more than half the sites within 25 years.

Loss of structures, abandoned equipment and junk piles d minish more than merely the aesthetic appeal old mining sites have t visitors. Lost also will be the tangible record of lifeways, mining methods and practices in the region and under difficult environmental conditions in the late nineteenth and early twentieth centuries.

C14-1

1.1 DEVA C-14 Stabilize Historic Mine Structures

1.3 Alternative Actions and Their Probable Impacts

1. Increase patrols in areas which are accessible to visitors and receive heavy vandalism.

   Probable Impact - A higher level of NPS presence will discourage some specific acts of vandalism. Properties such as Cyty's Mill (Keane Wonder Historical District), Chloride City and Lost Burro Mine will benefit, however, deterioration will not be halted. Structures and remains will continue to be subjected to adverse environmental conditions.

2. Stabilize structures at historic sites which are important to definition of mining conditions and life styles of the time period that they represent.

   Probable Impact - The significant aesthetic and academically important remnants of early Death Valley Mining History, as represented by remaining structures, will be preserved in their present condition for visitor enjoyment and study at the sites selected for treatment. These structures will continue to be subject to vandalism.

3. No Action or Continue Current Management Practices

   Probable Impact - The properties currently subject to "benign neglect" will continue to be vandalized and deteriorate under stress from environmental conditions. At exposed sites such as Cyty's Mill, Chloride City and Aguereberry's Camp vandalism and environment are acting to rapidly obliterate historic remains. At present rates of deterioration it is estimated that the historic fabric will be lost at more than half the sites within 25 years.

1.4 Recommended Course of Action

1. Increase patrols to sites which receive heavy visitation and/or are subject to heavy pressure from vandals. This may include necessity of hiring additional seasonal rangers for patrols to the Racetrack area, Chloride City, Keane Wonder Mine and southern Panamint Mountains.

2. Compile a prioritized list of abandoned mine properties with structures in need of stabilization based on current conditions, cultural significance and accessibility.

1.1 DEVA C-14 Stabilize Historic Mine Structures

3. Prepare a 5-year plan to stabilize the structures on the prioritized list, complete with appropriate documentation and funding requests. The Keane Wonder Mine PRIPS project can serve as an example.

SEE - Natural Resource Project Statement DEVA N-23, Mine Shaft Hazard Elimination

List of Historically Significant Properties attached.

Appendix V

Criteria for Prioritizing Needs in Regional RMPs

Criterion	Description
1. Mandated action	A project that is required by a direct court order, a specifically worded regulation, a specifically stated legislative directive, or a specific administrative direction from higher authority.
2. Enabling legislation	A project that is proposed to conform with a specific statement in the park enabling legislation regarding a reason why the park was established.
3. Potentially significant contribution	A proposed project that will provide information needed for making an important management decision or will make a significant contribution to a management action identified as having an important impact on park natural resources or park values.
4. Urgency	A proposed project that will provide support to a time-urgent management effort to preserve the integrity of an identified natural resource or ecosystem process.
5. Rank in park RMP	A proposed project that is in the top group of unfunded needs identified in the park natural resource management plan.
6. Provide baseline data	A proposed project that is needed to develop baseline natural resource data that are important to the park purposes or values and for which existing inventory or baseline data are inadequate to support present or future decision making.
7. Provide a necessary action for mitigating a significant threat to park resources	A proposed project that is intended to prevent loss of park resources in a situation where there is a high likelihood of adverse impact, the adverse impact will be extensive, immediate, of long duration, or irreversible; or the impact will reduce the integrity of a resource, diminish a park purpose or park value, or prevent the achieving of a stated park management objective.
8. Important for planning	A proposed project that directly responds to an identified need to support an ongoing or scheduled planning activity.
9. Supports multipark problem solving	A proposed project that is designed to solve similar problems at two or more parks in a manner that reduces costs or increases the efficiency and effectiveness of the activity compared to doing the activity separately in each of the affected parks.
10. Addresses the impact of park activities on park neighbors	A proposed project that is designed to provide information or products that improve the ability of the park to conduct its activities without causing unwarranted hardship to park neighbors.
11. Likelihood of management action	A proposed project that results in action or is of such a nature that, upon completion, there is a high probability that any needed follow-up management action or sequential projects will in fact be conducted in a timely and effective manner, thus maximizing the benefits of having conducted the proposed project.
12. Special park status	A proposed project that is intended to benefit those resources of a park that have led to the park being given special status through legislative or administrative action—e.g., actions that designated part or all of the park as a wilderness area, Class 1 air quality area, World Heritage site, Biosphere Reserve, National Landmark, or Research Natural Area.

Request Letter

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April 11, 1985

The Honorable Charles A. Bowsher
Comptroller General of the United States
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Bowsher:

It has come to my attention that your office is undertaking a review of threats to the natural and cultural resources of the U.S. National Park System. As you may know, the Chairman of the Subcommittee which formerly had responsibilities for national parks issues, Mr. John Seiberling, introduced bills in both the 97th and 98th Congresses that were intended to provide a means of reviewing and assessing possible adverse impacts upon parks resulting from federal activities in areas adjacent to the parks. Both bills passed the House but got no further. As Chairman of the new Subcommittee with oversight responsibility for the national parks, I am greatly concerned that if something is not done soon to address these threats, in 20 to 30 years many of the parks' natural and cultural resources will be irreversibly lost or severely damaged.

The National Park Service responded to 1979 legislation, originating in this House Committee, by preparing and issuing in 1980 a "State of the Parks" report to the Congress. The report identified specific threats which endangered resources of individual parks, sources of threats both inside and outside the parks, and endangered park resources. The Administration has stated that legislation is not needed to protect the parks' resources. I am concerned, however, about the adequacy of what the Park Service has been doing since 1980 to further define the threats (i.e., establish baseline data and monitor the individual threats) and initiate actions to alleviate them.

The Honorable Charles A. Bowsher
April 11, 1985
Page Two

I believe that a GAO review of this area could provide the Subcommittee valuable information for use in its future efforts to assure the protection of park resources. Therefore, I am requesting that GAO perform this review for the Subcommittee and that your staff consult with Subcommittee staff regarding the number, types, and geographical dispersion of the parks to be included in the review. Any questions regarding this request should be addressed to Mr. Dale Crane of the Subcommittee staff at 226-7736.

Sincerely,

Bruce F. Vento
Chairman, Subcommittee
on National Parks and
Recreation

Comments From the Department of the Interior

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

December 18, 1986

Mr. J. Dexter Peach
Director, Resources, Community and
Economic Development Division
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Peach:

We have reviewed the draft General Accounting Office (GAO) report entitled, "Limited Progress Made in Documenting and Mitigating Threats to the National Parks," (CED-87- 36) and have several comments which we believe would make the report accurate. In general, we believe that the report fairly addresses the questions that the Subcommittee on National Parks and Recreation has raised about National Park Service (NPS) actions since the 1980 State of the Parks report.

GENERAL COMMENTS

See comment 1

The report places a great deal of emphasis on the 1980 State of the Parks document. The report should acknowledge that this document, while important for pointing out the need for better resource information, did not in itself provide such detail. It should point out that as part of the NPS Management by Objective (MBO) system, a systemwide effort to gather and assess resource data required to make management decisions is currently being implemented (i.e., Natural Resource Assessments and Action Programs, Cultural Resource Assessments and Action Programs).

See comment 2

The State of the Parks document also helped focus attention on the need to address actions external to parks, but which could impact park resources. We believe the GAO report should point out that the Under Secretary convened a task force to examine this issue that resulted in substantial new initiatives within the Department of the Interior. These are now codified in the Departmental Manual (copy attached).

See comment 3

The report states that the Service has not used Resource Management Plans (RMP's) in preparing annual budgets. It is true that, to date, the Service has not used resource management plans at the Washington Office level to prioritize resources management projects across Regions and develop an annual Servicewide resources management budget. However, the Regions and Parks are increasingly using the plans as part of the budget formulation process to prepare their annual operating programs for Park and Regional base funds, to request base increases, and to prepare requests for funding from Servicewide natural and cultural resources management funding sources, such as the Natural Resources Preservation Program.

See comment 4

The report indicates that the Service has not implemented all of the 11 initiatives proposed in a January 1981, NPS report to the Congress entitled, "State of the Parks: Servicewide Strategy for Prevention and Mitigation of Natural and Cultural Resources Management Problems." We are concerned that the report places too much emphasis on the Service's progress in implementing these proposed initiatives. In fact, the Service has replaced

See comment 5.
Now on pp. 12 and 13.

many of the 11 initiatives with what the Service feels are more practical and useful action items under the Service's 12-Point Plan. Although the report states that "[a]ccording to its Fiscal Year 1987 budget documents, the Park Service is still committed to its resource management strategy as outlined in 1981 (page 16)," the budget does not actually refer to the initiatives; it does refer to the 12-Point Plan. In addition, the report's focus on the 11 initiatives seems to be unrelated to the recommendations on pages 49 and 50. These recommendations relate to problems in the resource management planning process, rather than any need to implement the 1981 proposed initiatives.

Now on p. 37.

See comment 6.

There was little emphasis in the report on the need for better program evaluation. Since the need for resource management funding may continue to grow, greater priority ought to have been placed on the need for evaluating how well current funds are being directed toward priority problems.

See comment 7.

Notwithstanding the concerns expressed in our response, we agree with the thrust of the report's recommendations. Specifically, the NPS views RMP's as important documents for the management of park resources. In this regard, we are attempting to strengthen their role in programming and budgeting and we are currently reviewing the RMP guidelines to assure that they fully address budgeting and priority-setting needs. Additionally, we agree that the Service has a fundamental need for useful baseline inventory data. However, we believe that the report neglects to emphasize in its recommendations that in taking actions to improve park information bases, the Service must not only make a one time effort to collect baseline information, but must also establish long-term programs to monitor appropriate parameters for changes over time.

SPECIFIC COMMENTS

Now on p. 4
See comment 8.

Page 5 — Recommendation 2 should read "improve procedures to use..." it is incorrect to imply that there are no procedures in place. Current procedures, however, need improvement.

Now on p. 27
See comment 9.

Page 35 — The report states that National Park Service has not completed any of the actions planned under the initiative to (a) determine completeness of resource information base, (b) require basic inventories, and (c) develop guidelines to produce useful information on significant park resources. In the curatorial sector, National Park Service has significant programs and accomplishments in each of these areas. For example:

(a) Completeness of Resource Information Base:

Through development and use of the Collections Management Report (Form 10-94, Attachment 1), we have a basic determination of the completeness of the resource information base (National Catalog) as it applies to museum objects. As of November 21, 1986, these reports will be completed for 1983-1986.

(b) Basic Inventories:

The basic inventory for museum objects, a catalog, has been a National Park Service requirement since the 1930's. Since the State of the Parks Report was issued, we revised and streamlined our manual cataloging procedures in 1984, and computerization of these procedures (Automated National Catalog System (ANCS)) will be completed in December 1986. Since 1982, the parks have more than doubled the rate of production of cataloging records. With the introduction of automation, we expect an even greater increase.

(c) Guidelines to Produce Information on Significant Park Resources:

Guidelines have been developed to revise and computerize the National Catalog. These guidelines were issued in 1984, in Part II of the Museum Handbook, and will be issued in the ANCS Users Manual in January 1987. The National Catalog provides access to objects and their associated documentation for management, research, and interpretation. In 1986 we developed draft criteria for establishing the significance of objects to assist in setting priorities for management actions. The National Park Service, since 1982, has updated and enhanced the List of Classified Structures, instituted a Cultural Resources Bibliography, National Register Data Base, and has updated NPS-28. The latter is the Park Service's Guideline, and it has been issued to inform the field what is needed and how to do it, regarding the inventory, evaluation, registration, and treatment of Cultural Resources. We agree that standards are needed to help all levels of management to determine the level of documentation needed based on the type of park and the significance of the cultural resource base.

Now on p. 31
See comment 10

Page 40 — Since 1980, increased training has been provided in collections management. The basic Curatorial Methods Course has been expanded from 1 week to 2 weeks. This course provides basic training for park personnel who are responsible for management of museum collections. A new annual course has also been developed, "Critical Issues: Workshop in Curatorial Management." This course, for mid-level curators, focuses on different topics each year, providing information on new developments in collections management. In addition, centralized training for trainers has been provided in the revised cataloging system and these trainers have in turn repeated the training program in each Region. A tape-slide show on the revised cataloging system is also under development.

See comment 11

The Regional natural resource management plans, which the Service formally has termed the "Regional Natural Resources Assessments and Action Programs" constitute an important part of the Service's plan for developing a long-term resource management strategy and merit further discussion in the report. The Regional Natural Resources Assessments and Actions Programs will contain information on resources staffing, funding, planning, and activities; the adequacy of data on, the condition of, and threats to resources; and major Regional issues. The Regional Natural Resources Assessments and Action Programs will list Regional unfunded resources management projects that the Regions will rank using standardized criteria and weights and will outline a 5-year program for addressing Regional natural resources needs. Since the Service now has completed the procedures for developing the assessments and action programs, we recommend that the GAO review these procedures before finalizing the draft. A copy of the procedures are available. The Regional Natural Resources Assessments and Action Programs will also contain the results of a threats survey, a draft of which is included in the procedures. The survey instrument is currently being reviewed by social scientists and we hope to have the final version ready soon. This survey will give us more credible, current information on the status of threats.

Now on p. 40
See comment 12

Page 51 — The report states that GAO has been unable to determine how much progress the National Park Service has made in documenting and/or mitigating resource threats Servicewide. While the Park Service has not maintained a current and comprehensive list of threats and responses to them on a Servicewide basis, the Service has made some progress on addressing several major problem areas. After publishing the State of the Parks report in 1980, the Service created the Air Quality, Water Resources, and Energy, Mining and Minerals Divisions. These Divisions have documented and mitigated many air quality, water quality and quantity and mining threats to park resources over the past several years.

Now on p 44
See comment 13

Page 57 — The report indicates that cost estimates to catalog the backlog of uncataloged museum objects were not available in 1982. Rough estimates, however, were provided in 1986, at the request of the House Committee on Appropriations and a revised Servicewide estimate, based on park developed estimates. The estimates will be available in December 1986.

Now on p 51
See comment 14

Page 65 — Appendix II of the report consists of an opinion by the GAO on the Public Trust Doctrine. We believe that this discussion should be deleted. It is a misnomer to address NPS issues under a public trust concept. The notion of a public trust has been specifically rejected by the court. As the District Court clearly noted in Sierra Club v. Andrus, 487 F. Supp. 443 (D.D.C. 1980):

> To the extent that plaintiff's argument advances the proposition that defendants are charged with "trust" duties distinguishable from their statutory duties, the Court disagrees. Rather, the Court views the statutory duties previously discussed as comprising all the responsibilities which defendants must faithfully discharge. (Emphasis in the original).

In addition, the public trust concept generally refers to another evolving area of state law related to state administration of its water resources. In particularly, the Mono Lake litigation in the State of California is a more relevant discussion of this legal concept. See, National Audubon Society v. Superior Court of Alpine County, 33 Cal. 3rd 419 (1983).

Finally, the exercise of the Secretary's duties and responsibilities to conserve and protect the various areas of the National Park System, however, the perceived threats are identified, must be exercised on a case-by-case basis, fact by fact inquiry. And, the initiation of litigation to enjoin certain activities would require the support of the Department of Justice. The GAO opinion, which generally endorses the legal views of the Solicitor's Office, adds little to the resolution of these very complex legal and factual problems. Rather, we would urge that in lieu of Appendix II the report note in its body that the legal issues associated with the GAO review have been analyzed by the Solicitor's Office.

Now on p 62
See comment 15

Page 75 — The report should recognize that the criteria for the Cultural Resources Preservation Fund has, for the past 3 years, specifically addressed resource basic information and resource stabilization and more recently has been revised to improve the prioritization process.

If you have any question or would like to discuss our comments, please let me know

Sincerely,

William P. Horn
Assistant Secretary for Fish and Wildlife and Parks

The following are GAO's comments on the Department of the Interior's letter dated December 18, 1986.

GAO Comments

1. We have revised the discussion of the regional resource assessments and action programs in chapter 2 to point out that this systemwide effort is being implemented as part of the Park Service's management by objectives system.

2. The findings and recommendations of the Under Secretary's task force were discussed in chapter 1 of our draft report. The departmental manual release, dated October 20, 1986, makes the task force's findings Department policy, but the release does not require Interior agencies to implement new procedures. Instead, it instructs the agencies to promote and encourage greater cooperation and coordination. We have clarified these points in chapter 1.

3. This comment has been added to the discussion of using RMPs in preparing annual budgets in chapter 2.

4. The report discusses the status of the 11 initiatives because they were the actions the Park Service decided to undertake in response to the State of the Parks report. It was not until April 29, 1986, that the Park Service Director announced an action agenda to implement a 12-point plan to improve the Park Service. The report recognizes, however, that many of the 11 original initiatives were replaced by action items in the 12-point plan, including 2 of the 11 initiatives that were started and discontinued and the 1 that was never started.

5. We have revised the discussion on page 16 (now pp. 12 and 13) to reflect the change in strategy in 1986.

6. We agree that agencies should conduct evaluations to determine how well current funds are being directed toward priority problems. However, the requestor did not ask us to review this program area.

7. The Department's comments are addressed in chapter 2.

8. We have made the suggested change.

9. We have inserted a discussion of improvements made to the National Catalog of Museum Objects as an example of the progress that has been made in improving the cultural resources information base.

10. The report acknowledges that resource management training has increased significantly, but we have added a discussion of the specified training courses as examples of the increased training.

11. We have revised the report's discussion of regional resource assessments and action programs to reflect the agency's current position on the content and intended use of these programs.

12. The creation of the new divisions and the efforts of these divisions to address resource management problems are already discussed in chapter 2.

13. We asked for the estimated cost of eliminating the backlog of uncataloged museum objects and were told that it would not be available until mid-January 1987.

14. We do not agree that appendix II should be deleted. The requestor specifically requested GAO's views on the Public Trust Doctrine. We do agree that the Secretary has no public trust duties with respect to the parks beyond those set forth by statute and so stated in the appendix. We have added a paragraph at the beginning of appendix II to make this clearer. Finally, we agree with Interior that the exercise of the Secretary's duties to protect the parks from threats must be on a case-by-case basis.

15. This appendix refers only to the regional natural resource management plans prepared in 1986. There were no such plans for cultural resources.

Major Contributors to This Report

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